



6.B-2008 Student Records Policy

1. Purpose

To ensure records of students are held and maintained in a manner that respects the privacy of the information, is confidential and complies with Alberta's *Personal Information Protection Act*.

2. Policy

St. Mary's University (University) strives to protect the privacy of students and maintain the confidentiality of student information. The University accepts the responsibility of keeping all records pertaining to students out of the hands of those who would use the information for illegitimate purposes. This policy outlines the principles and practices followed in protecting the personal information of students.

This Policy pertains to student information which is generally defined as the "Official Student Academic Record". This definition is not limited to that information, which is contained on the student's transcript, but includes all information which is collected for the purposes of admission, registration, awards, and academic performance as required by the University. The policy applies to all versions of that record, whether in computerized databases or hard-copy files, and to all offices where that record may be stored, whether collected by that office or duplicated from the Registrar's official record.

Student information which is collected and maintained by other offices and for purposes other than those specified above (i.e. is not part of the Official Student Academic Record) does not come under this policy but is under the jurisdiction of the head of that office, who will follow the Institutional Privacy Policy and any other policies established regarding the information. For example, this policy does not pertain to the medical information collected from student athletes.

This policy applies to the institution of St. Mary's University as well as any person or organization providing services on our behalf. All staff and faculty of the University must

Approval Authority	Responsible Office	Effective Date	Date Last Revisited	Review Frequency
Board of Governors	Academic			Every 5 years

respect the confidentiality of student information they acquire in the course of their work. A copy of this policy is provided to any individual on request.

2.1 Information Steward

The custody of student records is vested in the Registrar by delegation from the President's Council. As such, the Registrar has the responsibility and authority to grant or deny access to student records, consistent with this policy. It should be stressed that the entitlement to access certain records does NOT include authority to release information from the record except as provided for in this policy. All matters pertaining to the interpretation of this policy should be referred to the Registrar.

2.2 Definitions

- 2.2.1 **Personal information** – information about an identifiable individual, for example: name, address, telephone numbers, e-mail address.
- 2.2.2 **Records** – All recorded information, regardless of its physical form or characteristics, created or received pursuant to the transaction of university business or the fulfillment of its educational, administrative, business or legal obligations.
- 2.2.3 **Disclosure** – release of information, with permission, to a third party.
- 2.2.4 **Minimum Retention** – The minimum amount of time a particular series of records should be retained.
- 2.2.5 **Administrative Value** – The usefulness of a record in the conduct of the office's business.
- 2.2.6 **Archival records** – Records of historic or documentary importance.
- 2.2.7 **Permanent** – An indefinite retention period signifies that the records have sufficient value or importance to justify keeping them in perpetuity.

2.3 Collection of Information

Information collected by the University from a student prior to admission, at the time of admission, during the registration process or at any other time is either mandatory or voluntary. Mandatory information is that which the University believes to be essential to its proper function or which is required by law or regulation to be collected. Voluntary information is what is considered desirable but not essential for the functioning of the University.

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The University will not collect as mandatory information: records of race, ethnic origin, religion, political view or affiliations, social views, habits, or affiliations.

The following information is determined by the Registrar to be mandatory and must be recorded as part of the Official Student Academic Record: name, student ID number, academic program, level and number of hours of study, date of birth, country of citizenship, date of entry into Canada if applicable, country of residence, sex, immigration status, educational background at the time of admission, address(es), record of courses registered for and the resultant academic status, academic status at the end of term/year, admission decisions.

The following student information may be collected from students by various departments although it is not considered part of the Official Record: library use, academic counseling records, medical documentation, records of disciplinary proceedings, personnel records of students employed by the University, digitized photograph for ID card.

In addition to these formal records, it is recognized that private notes are occasionally kept regarding students by university employees. These notes are not regarded as official records of fact or records open to public scrutiny but are regarded as an extension of the staff or faculty member's memory and, as such, are private property. Accordingly, all University employees are held accountable for the confidentiality and physical security of their personal records.

2.4 Classification of Information

All information collected and maintained as part of the Official Student Academic Record is defined as either part of the Public Record or the Confidential Record as follows:

2.4.1 Public Record

The following student information is considered Public Record:

- Dates of Registration at St. Mary's University
- Degree/Diploma/Certificate awarded from St. Mary's University and Date Awarded
- Names of St. Mary's University award recipients

2.4.2 Confidential Record

2.4.2.1 Category A

This category contains personal identification and contact information:

- ID Number
- Names
- Address and telephone numbers
- Personal or student email addresses
- Gender
- Full/Part-time status
- Year of program
- Registration status
- Withdrawal status and date

2.4.2.2 Category B

This category contains demographic information, academic information and personal information required for legitimate education purposes:

- Academic program (e.g. major, minor)
- Admission type (e.g. regular, mature) and conditions
- Student category (e.g. new, transfer, continuing)
- Copies of correspondence to and from students (e.g. letters, emails)
- Academic advising notes
- Courses and grades
- Academic standing (e.g. probation, etc.)
- Information related to previous educational history
- Birthplace and date
- Marital status
- Country of citizenship and immigration status
- Parent's name and address
- Emergency contact's name and address
- "Hold" indicator

2.4.2.3 Category C

This category contains information which identifies the exact location of a student while on campus:

- Student's course timetable
- Student's examination schedule

2.4.2.4 Category D

This category contains financial information:

- Tuition and general fees assessment
- Fee payment details
- Financial assistance details (e.g. student loans, bursaries)
- Third-party billing details
- External awards received
- St. Mary's University awards received (if the recipient requests confidentiality)
- Fee withhold information
- Tax receipts

2.4.2.5 Category E

This category contains information of a very private or personal nature:

- Letters of recommendation
- Medical and counselling reports
- Disciplinary rulings for academic or non-academic misconduct
- Confidential academic advising notes
- File memos explicitly marked confidential

2.5 Access to Information

The information contained in the public Record can be released without prior consent of the student.

Access to information contained in the Confidential Record is restricted as defined below except with written consent of the student. The individuals listed below may be required to sign a confidentiality agreement before accessing student information.

Individuals	Access
Registrar Vice-President Academic	All Categories
President Associate and Assistant Registrars	Category A, B, C & D Category E as deemed necessary and appropriate by the Registrar.

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Individuals	Access
Student Services Officers	
Vice-President Finance Finance Staff Members	Category A & D Specific information from Category B & E as deemed necessary and appropriate by the Registrar.
Area Chairs Advisors Recruitment Officers	Category A, B & C Specific information from Category E as deemed necessary and appropriate by the Registrar.
Faculty Members	ID Number, Name, Full/part-time status, Academic Program, Year of Program and Advisor for those students registered in their classes. All faculty members will have access to their students' St. Mary's University e-mail addresses via the class e-mail list.
Students	Students are entitled to an official or unofficial transcript of their academic record, at a reasonable charge, unless there are sanctions in the form of fines, outstanding library books, etc. Students have the right to inspect their own record, in the presence of a St. Mary's University representative, excluding file memos marked confidential and information from Category E that was provided in confidence. Students may request copies of items in their files, excluding file memos marked confidential and information from Category E that was provided in confidence. A reasonable fee may be charged.
Alumni Affairs	Upon graduation or upon transfer after completing 30 credits, Category A information is forwarded to the Office of External Relations for the purpose of alumni affairs unless opted out by the student on their registration form or convocation response card.
External Relations	Contact information from Category A of active students is provided for the purpose of keeping students informed about campus activities.
Athletics & Campus Recreation	Category A plus Athletics notations Specific information from Category B & C as deemed necessary and appropriate by the Registrar.
Library Circulation	Category A

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<p>Students' Association</p>	<p>Recognizing that the Students' Association may need to contact all students from time to time, the Registrar will provide to the President of the St. Mary's University Students' Association or designate, mailing labels at established "charge back" rates with the following information: student's surname and initials and an appropriate mailing address.</p> <p>Recognizing that the Students' Association conducts elections annually, the Registrar will provide information as follows to designated persons in the Students' Association for the election or referendum purposes: full legal name, student ID number, enrolment status (e.g. full or part-time).</p> <p>The Students' Association shall certify to the Registrar that the information shall be used only for the purpose for which it was provided, shall only be accessed by the necessary individuals, shall be secured and shall be destroyed when the purpose is finished.</p>
<p>Third-Parties (e.g. Parents or other Institutions)</p>	<p>Disclosure of any information to parents, educational institutions or other agencies must be authorized in writing by the student, except for that information previously defined as Public Record.</p> <p>Properly identified representatives of federal and provincial government agencies may be given the following information if expressly requested on an individual basis: verification of birth date, home and mailing addresses, telephone numbers, and next of kin contact information.</p> <p>Category A and B demographic, program and graduation related data will be submitted to Alberta Advanced Education & Technology or Statistics Canada on a regular basis for the sole purpose of reporting ASI, LERS and other mandatory submissions.</p> <p>The University has a responsibility to release information related to confirming enrolment in regards to Financial Assistance applications. The University also has a responsibility to inform financial aid organizations and Immigration Canada when a student's enrolment status changes.</p> <p>If in default of any obligation to the University, financial and contact information may be disclosed to a collection agency acting on behalf of the University.</p> <p>Information must be provided to other parties, without the authorization of the student, upon production of a court order.</p>

2.6 Release of Information

Official transcripts are issued by the Office of the Registrar only upon request of the student. They are issued to the student personally or to whomever the student designates. An official transcript bears the signature of the Registrar and the official seal of the University.

Unofficial copies of the student's academic record are issued in the form of:

- Unofficial transcripts or degree audits issued to advisors as appropriate for consideration for admission, academic standing, awards, or the advising of students.
- Unofficial transcripts issued at the student's request.

Letters confirming student enrolment or eligibility to graduate are issued to the student personally or to whomever the student designates only upon the request of the student.

T2202a forms are made available to students on myStMU at the end of February each year. Duplicate tax forms are issued to the student personally or to whomever the student designates only upon the request of the student.

Student account balances can be released to an individual for payment purposes as delegated by the student on their registration form.

Note: Information may be withheld if there are sanctions on a student's account in the form of fines, outstanding library books, unpaid accounts, etc.

2.7 Objections to Release of Information

Students who object to the release of information regarding their records in accordance with the policy stated herein should notify the Registrar in writing, giving the specific objection. Appropriate action will be taken by the Registrar who will so advise relevant individuals.

2.8 Maintenance of Information

St. Mary's University makes every reasonable effort to ensure that student information is accurate and complete. If there is a change to students' personal

information that may affect their relationship with the institution, they should contact the Office of the Registrar.

Students are responsible for ensuring the accuracy of their official record by verifying the Grade Report provided at the end of each term and the transcript provided at convocation. Students should be aware that only the official academic history (transcript) is retained permanently and that source information from the student file is destroyed in accordance with the retention guidelines stated herein. Queries regarding errors or omissions on the official academic history must be made as soon as possible and will not be considered after the source information has been destroyed.

If students are aware of an error in their student records, they should inform the Office of the Registrar. Appropriate action will be taken by the Registrar to research and resolve the discrepancy. In some cases, the student may be asked for a written request for correction.

2.9 Security of Information

The University protects students' personal information in a manner appropriate for the sensitivity of the information. The University makes every reasonable effort to prevent any loss, misuse, disclosure, or modification of personal information, as well as any unauthorized access to personal information.

All faculty and staff members must protect students' personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure, and destruction. The University uses appropriate security measures when destroying students' personal information, including shredding paper records, and permanently deleting electronic records.

2.9.1 Access to Student Information System

The Registrar has the authority to grant or deny access to the Student Information System. Individuals who wish to access the system must commit to adhering to this policy and operational guidelines for system workstations. All system users are required to sign a declaration, certifying that they have read, understood, and agreed to abide by the *Student Records Privacy Policy*. Any violations of the policy and guidelines will result in denial of access to the system and potentially termination.

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2.10 Retention of information

The permanent retention of student records is valid for administrative and historical purposes in paper and/or electronic form. The permanent official folder for each student is maintained by the Office of the Registrar. Only students' official academic history will be kept indefinitely. Source information will be retained according to the schedules outlined below. Following the minimum retention period, the records in question will be destroyed using a method that preserves the confidentiality of the information. Prior to destruction of source material, the Office of the Registrar will ensure that the contents of the file are accurately reflected in the student's official academic record.

Records of unpaid accounts may be retained so long as any obligation to the University remains unpaid.

2.10.1 Admissions Records*Admission Data for Applicants Not Enrolling*

<i>Record Type</i>	<i>Description</i>	<i>Minimum Retention</i>
Applicant information	Contact and demographic data on applicants who do not enroll contained in student information system	Permanent
Application for admission	Application form; may include personal statements, interim transcripts, letters of recommendation, interview notes, etc.	2 years after application term
Correspondence	Correspondence related to admissions process	2 years after application term
Entrance exam reports/test scores	May include TOEFL, SAT, GRE, etc.	2 years after application term
International documentation	May include copy of visa, correspondence related to obtaining visa, etc.	2 years after application term
Prospect information	Contact and demographic data on prospects who do not apply	2 years after date received
Transcripts	Course registrations and grades from prior educational institutions	2 years after application term for applicants or 1 year after received for prospects

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2.10.2 Registration & Academic Progress Records

Admission Data for Applicants Who Enroll

<i>Record Type</i>	<i>Description</i>	<i>Minimum Retention</i>
Application for admission	Application form; may include personal statements, interim transcripts, letters of recommendation, interview notes, etc.	7 years after convocation or date of last attendance
Correspondence	Correspondence related to applicant's acceptance or rejection	7 years after convocation or date of last attendance
Entrance exam reports/test scores	May include TOEFL, SAT, GRE, etc.	7 years after convocation or date of last attendance
International applicant documentation	May include copy of visa, correspondence related to obtaining visa, etc.	7 years after convocation or date of last attendance
Transcripts	Course registrations and grades from prior educational institutions	7 years after convocation or date of last attendance

2.10.3 Registration & Academic Progress Records

<i>Record Type</i>	<i>Description</i>	<i>Minimum Retention</i>
Academic action records	Communications re: actions such as academic probation, suspension, expulsion, etc.	7 years after convocation or date of last attendance
Application to Graduate	Self-explanatory	7 years after convocation
Correspondence	Self-explanatory	7 years after convocation or date of last attendance
Course cancellation records	Cancellation of registration forms and related records	If not recorded on transcript – 2 years after date submitted If recorded on transcript (W) – life of affected grade roster
Course registration records	Forms and records related to course registrations and course changes	7 years after convocation or date of last attendance

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Course withdrawal records	Course withdrawal forms and related records	Life of affected grade roster
Degree audit records	Includes print outs of individual degree audits and summary reports of all students	Until administrative use ends
Grade/progress reports	Self-explanatory	Sent to students – no copies kept on file
Letters of permission	Request form and copy of associated letter of permission to take courses elsewhere	7 years after convocation or date of last attendance
Name change records	Letters or forms requesting change in name, copies of ID documents.	7 years after convocation or date of last attendance
Parchments	Self-explanatory	Original issued to student (if parchment held for fees kept permanently). Copy kept for 7 years after convocation
Program applications	Self-explanatory	7 years after convocation or date of last attendance
Student conduct records	Documentation of academic dishonesty and conduct violations among students. May include incident reports, final reports, evidence, correspondence, etc.	77 years for cases involving expulsion, degree revocation or negative notation on the transcript; 10 years for cases involving suspension; 7 years for all other disciplinary cases
Student information	Contact and demographic data on prospects who do not apply	Permanent
Transcript requests	Self-explanatory	1 year after date submitted
Transcripts	Official course and grade records	Permanent
Transfer credit requests	Self-explanatory	7 years after convocation or date of last attendance

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2.10.4 Student Finance & Award Documents

<i>Record Type</i>	<i>Description</i>	<i>Minimum Retention</i>
Award applications	Applications, transcripts, evaluative records, reference letters, etc.	7 years after graduation/date of last attendance
Award letters	Letters conveying the receipt or denial of awards	7 years after graduation/date of last attendance
Awards ceremony documents	Documentation of awards ceremony planning and implementation. May include planning RSVPs, program, etc.	Retain one permanent copy of program for archival purposes; other materials until administrative value ends
Awards committee records	Documents used in the decision process for awards disbursement	7 years after the disbursement meeting
Delinquent account records	May include correspondence, reports, etc. related to unpaid accounts.	7 years after graduation/date of last attendance
Invoices/receipts	Self-explanatory	Copies printed to issue to students and not kept on file
Payment records	May include payment arrangement contracts, deferred fee forms, related correspondence, etc.	7 years after graduation/date of last attendance
Student loan records (Federal & Provincial)	May include correspondence, loan documentation, confirmation of enrolment documentation, etc.	7 years after graduation/date of last attendance
Student savings plans	May include correspondence, confirmation of enrolment documentation, etc.	7 years after graduation/date of last attendance
T2202A Duplicate Requests	Self-explanatory	1 year after date submitted

2.10.5 Student Affairs & Academic Advising

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These documents are not part of the official record of students but encompass many aspects of student life and activities at the University, including advising, career counselling, campus ministry, athletics, clubs and other activities.

<i>Record Type</i>	<i>Description</i>	<i>Minimum Retention</i>
Advising records	May include progress reports, statements of academic interests, advisor's notes, etc.	1 year after convocation for graduates or 2 years after date of last attendance for non-graduates
Athletics teams	Information on student teams, including participants, coaches and results	Update as necessary; transfer summary to archives annually
Client files	Records of counseling activities with students who visit campus ministry, career counseling, etc.	7 years after convocation or date of last attendance
Clubs and organizations	Information on student clubs and organizations, including current leaders, faculty advisor and membership statistics	Update as necessary; transfer summary to archives annually
Disciplinary hearings	Documentation of non-academic complaints, notifications, hearing summaries, minutes or tape recordings of hearings, and similar records concerning disciplinary hearings for students.	10 years following date of involved students' graduation or last attendance
Locker rentals	Locker rental forms	Current academic year
Medical clearance/waivers	May include athletics medical forms documentation or course related medical/travel waivers	7 years from date of signature
Photo releases	Self-explanatory	7 years from date of photo being archived and no longer in use
Program/schedule worksheets	Self-explanatory	Until advising value ends
References	Request for reference letter; may include copy of reference letter	7 years after date requested

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Services to students with disabilities	Records may include health professional evaluation reports, recommended accommodations, correspondence regarding accommodations	7 years after convocation or date of last attendance
Student groups (advising)	Records and correspondence related to advising student groups, clubs and organizations	3 years
Vehicle registration	Vehicle registration forms	Current academic year
Wellness & recreation activities	Records related to wellness and recreation activities, including offerings, participation statistics, etc.	Update as necessary; transfer summary to archives annually

2.10.6 Other

These records encompass reports and documents created and used in the operation of the Office of the Registrar but are not included in specific student records.

<i>Record Type</i>	<i>Description</i>	<i>Minimum Retention</i>
Academic standing reports	Reports containing students names, GPAs, grade point deficiencies, etc.	Until administrative value ends
Annual reports	Annual statistical reports concerning admissions, activities, enrolment statistics, etc.	Retain one permanent copy for archival purposes; additional copies until administrative value ends
Applicant statistical reports	Non-identifying data pertaining to student demographics, performance, enrolment, etc.	Retain one permanent copy for archival purposes; additional copies until administrative value ends
Change of grade form	Self-explanatory	Life of affected grade roster
Class rosters	Lists of student enrolled in specific classes. May include student names, student numbers, term, enrolment status.	Until administrative value ends

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Convocation records	Documentation of convocation planning and implementation. May include planning records of convocation committees, convocation attendance forms, etc.	Retain one permanent copy of program for archival purposes; other materials until administrative value ends
Enrolment reports	Self-explanatory	Retain one permanent copy for archival purposes; additional copies until administrative value ends
Examination schedule	Self-explanatory	Until administrative value ends
Examinations, Tests and Term Papers	Student academic work held by faculty members. If faculty are leaving the institution, documents are transferred to the Area Chair or Registrar for storage.	Six months after completion of relevant term for uncontested grade results; six months after resolution for contested grade results.
Grade records	Documentation held by faculty members of test scores, class work scores, and final grades for students.	2 years
Grade rosters	Lists grades awarded by instructors and serves the basis for students' official academic records.	17 years. Prior to destruction, the Office of the Registrar shall ensure that the grade rosters have been accurately entered into the electronic record.
Master Timetable	Self-explanatory	Until administrative value ends
PIPA Request Records	Inquiries, access requests, requests to correct information, non-disclosure requests, etc.	Life of affected record
Routine administrative records	Copies of transcripts, graduation data, registration forms, degree audits and other student records	Destroy following their immediate administrative use.
Student statistical reports	Non-identifying data pertaining to student demographics, performance, enrolment, etc.	Retain one permanent copy for archival purposes; additional copies until administrative value ends

3. Retention Procedure

- 3.1 Documents such as locker and parking forms will be stored alphabetically in binders for the current academic year and destroyed at the end of each June.
- 3.2 In July of each year, the Registrar will extract a list of students applied two years ago or more but never attended.
 - a. The files of these students will be pulled and reviewed against the biographical and demographic information contained in the electronic record for accuracy.
 - b. The contents will be destroyed.
- 3.3 In July of each year, the Registrar will extract a list of students who graduated seven years ago or have not attended for seven years.
 - a. The files of these students will be pulled and reviewed against the electronic record for accuracy.
 - b. Any other documents required for a longer retention period will be secured in the relevant file – student conduct or disciplinary documents.
 - c. The remaining contents will be destroyed.
- 3.4 In November of each year, the Registrar will extract a list of students from the previous academic year who have not returned for the current year.
 - a. The files of these students will be pulled from active use.
 - b. The files will be reviewed for documents beyond their retention period.
 - c. These documents will be destroyed.
- 3.5 Advisors, faculty, and other staff will review student-related documents in their possession annually and destroy them according to the retention guidelines.