

 <b>Selkirk College</b> Policies		<b>Number and Title:</b> 6550 Protection of Privacy		
		Replaces: N/A		
		Effective: 2025-12-08	Next Review: 2030-12-08	
Executive Responsibility:	Administrative Responsibility:	Recommended by Policy Review Committee:		2025-02-25
President	Vice-President College Services	Recommended/Approved by Education Council:		N/A
		Approved by President:		2025-12-08
Linkage to Board of Governors Policies		E30, E40, GP200	Financial Condition, Asset Protection, Selkirk Board By-law	

## A. PURPOSE

This policy addresses the management of Selkirk College's approach to privacy.

As a public body that is subject to the British Columbia Freedom of Information and Protection of Privacy Act ("FIPPA," or the "Act") Selkirk College is committed to upholding the principles of privacy, transparency and accountability. Selkirk College also acknowledges and supports transparency with the community by facilitating access to college records and personal information in accordance with the requirements of the Act. This policy outlines the principles guiding Selkirk College's privacy management, persons deemed responsible for managing personal information, and the major elements of Selkirk College's privacy program. Examples of personal information include, but are not limited to, name, email address, mailing address, or the financial, employment, medical, academic, educational technology, and legal records of employees and students.

## B. SCOPE / LIMITS

This policy applies to employees, students, contractors, service providers, and others who handle personal information on behalf of the college, as well as the records at Selkirk College that pertain to students, employees, contractors, third parties, and service providers.

## C. PRINCIPLES

**Selkirk College is committed to:**

1. Protecting the privacy of students, employees and other individuals whose personal information it collects, uses, shares and retains.
2. Ensuring that all employees follow responsible information management practices to ensure that the College fully complies with its obligations under FIPPA and other applicable laws.
3. Respecting the privacy and confidentiality of personal information entrusted to them in the course of their duties and collecting, using and disclosing personal information only where authorized by FIPPA.

4. Using best practices and industry standards to effectively manage the information within the College's custody and control.
5. Collecting and using personal information only for the purposes for which it was initially collected and, if required, for related purposes in addition to this policy and requirements of the College and Institute Act and the Freedom of Information and Protection of Privacy Act.
6. Training those employees responsible for managing and securing personal information.

#### **D. RESPONSIBILITIES**

The following outlines responsibilities for the implementation of and adherence to this policy:

1. Under FIPPA, the Head of the Public Body is ultimately responsible for ensuring compliance with the Act. At Selkirk College, this responsibility has been designated to the President.
2. Operational oversight of privacy management is delegated to the Vice President of College Services, who may delegate authority as appropriate.
3. The Privacy Officer at Selkirk College is the primary point of contact for all privacy-related questions and public requests for information. This officer is responsible for ensuring that all inquiries from the public are addressed in accordance with relevant legislation and will process requests, provide necessary information, and ensure that all personal and sensitive data are handled in a manner that respects privacy and confidentiality.
4. Selkirk College employees are responsible for:
  - Making reasonable efforts to familiarize themselves with this policy and the requirements of FIPPA.
  - Completing privacy impact assessments (PIA) when developing or procuring any new or significantly modified initiative to ensure that privacy is fully understood and protected.
  - Following responsible information management practices to ensure that the college collects, uses and discloses personal information in compliance with FIPPA and other applicable laws.
  - Always seeking to protect personal information against unauthorized collection, use and disclosure.
  - Facilitating the appropriate release of records within their custody or control in response to access requests received from community members under FIPPA as it relates to their regular duties. Any such request that falls outside an employee's scope of work should be sent to the Privacy Officer.

- Supporting timely access to their personal information by individuals within the college's custody and control in accordance with the provisions of FIPPA.
- Reporting privacy breaches in accordance with the college's procedures enacted under this policy.

#### **E. Purposes for Collecting Personal Information**

1. The college communicates the purposes for which personal information is collected at or before the time the information is collected unless otherwise permitted or required by FIPPA.
2. In the ordinary course of carrying out its programs and activities, the college collects the personal information of its students and their parents/guardians for purposes including:
  - registration, enrollment and transfer of students;
  - to provide and deliver educational programs and services;
  - to accommodate students with documented disabilities;
  - to communicate with students and respond to inquiries or complaints;
  - to prepare and deliver assessments of student performance;
  - to supervise and ensure the safety and security of the college;
  - to investigate and respond to accidents, safety events, misconduct and similar incidents;
  - to ensure compliance with applicable college policies and other laws;
  - to make all required reports and filings to the Ministry of Post Secondary and Future Skills; and
  - for other purposes set out in the Procedures.
3. In the ordinary course of carrying out its employment programs and activities, the college collects the personal information of prospective, current and former employees for purposes including:
  - hiring and recruitment;
  - to manage and administer the employment relationship;
  - to communicate with authorized union representatives;
  - to administer employment compensation and benefits;
  - to evaluate performance and manage disciplinary incidents;
  - to supervise and ensure the safety and security of the college;

- to investigate and respond to accidents, safety events, misconduct and similar incidents;
- to ensure compliance with applicable college policies and other applicable laws;
- to enhance employee communication and foster engagement within the institution; and
- for other purposes set out in the Procedures.

#### **F. COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION**

1. The college limits the personal information it collects to information relevant and necessary in executing its programs and activities or for other purposes authorized by FIPPA.
2. The college seeks to collect personal information by fair, lawful and transparent means, including collecting personal information directly from the individual, except where otherwise authorized by FIPPA.
3. The college is committed to transparency regarding personal information collection. When collecting such data, we strive to:
  - Clearly communicate the purpose of data collection
  - Provide the legal basis for gathering the information
  - Offer contact details for a college representative who can address questions about data collection and usage
4. The college limits the internal and external use and sharing of personal information to what is required and authorized by FIPPA or consented to by the individual.
5. The college only uses or discloses personal information for its collected purpose, except with the individual's consent or as otherwise required or permitted by FIPPA or other laws.

#### **G. ACCURACY AND CORRECTION**

1. The college and its employees shall make reasonable efforts to ensure the accuracy of the personal information they collect and use while performing their duties.
2. Individuals have the right to request the correction of their personal information, and the college will receive and respond to such requests in accordance with the FIPPA and the Procedures of this Policy.

#### **H. ACCESS TO INFORMATION**

1. The college supports appropriate transparency and accountability in its operations by making information available to the public as permitted or required under FIPPA.
2. The college recognizes that individuals may request access to records within the custody and

control of the college, and the college will respond to such requests per FIPPA.

3. The college recognizes that individuals have a right to access their personal information within the custody and control of the college and will facilitate such access in accordance with the requirements of FIPPA.
4. The right of access does not extend to information excluded from disclosure under applicable sections as stated in FIPPA. However, if immaterial details can reasonably be severed from a record, an applicant has the right of access to the remainder of the record.
5. The right of access to a record may be subject to a required fee under Section 75 of FIPPA. Individuals requesting Selkirk College to release their personal information to a third party must authorize this release in writing. This can be submitted to the Privacy Officer, or, where applicable, through the Office of the Registrar for students or through the Human Resources Department for employees.

#### **I. RETENTION AND DISPOSAL OF INFORMATION**

1. The college does not seek to retain personal information longer than necessary to satisfy the college's applicable operational, instructional, financial and legal purposes.
2. Personal information no longer required for administrative, operational, financial, legal or historical purposes shall be securely destroyed confidentially per college policies and approved record retention protocols.

#### **J. DEFINITIONS**

The terms below are those used in the FIPPA and include types of information which must not be disclosed. The definitions use examples from the Selkirk College community to help illustrate their meaning.

**Academic Records:** Includes course grades, grade point average, academic status, graduation status, other institutions attended, admission status, course schedules and course registration status and all supporting documents.

**Access Request:** A written request for access to records within the custody or control of the College.

**Consent:** Means expressed written consent to collecting, using or disclosing personal information.

**Education Technology Records:** Includes services such as Moodle.

**Employment Records:** Includes personal recommendations, evaluations, charter references or letters of discipline and reason for terminations

**Financial Records:** Includes information about beneficiaries, insurance, benefits, debts, computer

loans, deductions, maintenance enforcement and personal tax information.

**FIPPA:** Means the BC Freedom of Information and Protection of Privacy Act and regulations thereto.

**Head:** The individual designated under FIPPA as having ultimate responsibility for ensuring that the public body complies with the Act.

**Information:** Refers to personal information unless otherwise specified.

**Initiative:** Means any enactment system, project, program or activity.

**Legal Records:** Includes disciplinary investigations or proceedings that lead to or could lead to a penalty or imposed sanction or policing.

**Medical Records:** Includes health care history related to medical, physical, psychiatric or psychological prognosis, treatments or evaluations.

**Personal Information:** Recorded information about an identifiable individual other than contact information. Examples of personal information include, but are not limited to, ethnicity, gender, marital status, employment history, criminal history, grades, personal tax information and health-related information.

**Public Body:** Includes a ministry of the government of British Columbia, an agency, board, commission, corporation, office or other body designated in, or added by regulation to, Schedule 2 of the FIPPA or a local public body (i.e. an educational body). Under the *College and Institute Act*, Selkirk College is an academic body and, therefore, a public body.

**Privacy Impact Assessment (PIA):** A formal risk assessment tool used to identify and address potential privacy risks associated with the collection, use, disclosure and storage of personal information in new or significantly modified initiatives, programs or systems. PIAs are submitted to the Privacy Officer for review and approval before program implementation.

**Privacy Officer:** The individual designated by the Head of the public body to be responsible for overseeing compliance with FIPPA.

**Record:** Includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records.

**Service Provider:** A person or organization contracted by Selkirk College to perform services. Service providers may require access to personal information, either regularly or from time to time.

**Selkirk College Leadership Team:** Refers to senior administrators of Selkirk College who lead a specific division, school, or department.

**Student:** This means any person enrolled as a student at the college.

**K. RELATED POLICIES AND RESOURCES**

Management of Privacy Breach  
Responding to Freedom of Information Access Requests  
Privacy Impact Assessment  
Website Privacy

**L. GOVERNMENT WEBSITES**

[http://www.bclaws.ca/civix/document/id/complete/statreg/96165\\_00](http://www.bclaws.ca/civix/document/id/complete/statreg/96165_00)  
<https://www.oipc.bc.ca/>  
[http://www.bclaws.ca/civix/document/id/complete/statreg/96052\\_01](http://www.bclaws.ca/civix/document/id/complete/statreg/96052_01)

**Note:** the above list is not exhaustive. Statutes, regulations, policies, procedures, directives, practices, guidelines and other documents related directly or indirectly to freedom of information and protection of privacy will be updated and changed over time.

[APRC Terms of Reference 2025.docx](#)

  
Signature

December 08, 2025

Date