

PRIVACY POLICY

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A. PURPOSE

Douglas College (the College) is committed to protecting the privacy of its Employees, its current, former and prospective Students and other individuals who access and use the College’s programs, services and website.

As a post-secondary institution in British Columbia, the College is subject to the BC *Freedom of Information and Protection of Privacy Act* (the Act). In compliance with the Act, the College is committed to

- securely maintaining Records at the College to protect the privacy rights of persons about whom the College collects Personal Information;
- preventing the unauthorized collection, use or disclosure of Personal Information;
- facilitating access to Records in the custody of, or under the control of, the College in accordance with the requirements of the Act;
- providing individuals with the right of access to, and a right to request correction of, their own Personal Information in accordance with the Act; and
- complying with its obligations concerning the protection of Personal Information under applicable laws.

The purpose of this policy is to ensure that College Students, Employees and others are aware of their rights and responsibilities under the Act and other applicable laws. Questions or concerns about this policy should be directed to the College Privacy Officer (see contact information below).



B. SCOPE

This policy applies to all individuals whose Personal Information is collected, used, disclosed or maintained by the College in the course of delivering its programs or activities. All Employees and independent contractors employed or engaged by the College are expected to be familiar with and to uphold the provisions of this policy. Any non-compliance with this policy by Employees will be subject to disciplinary action, up to and including termination.

C. DEFINITIONS

Employees: All Douglas College staff and faculty members, administrators and contractors.

Personal Information: Recorded information about an identifiable individual, including but not limited to name, birth date and personal contact information, and excluding business contact information, such as position name or title and business telephone, email or fax number.

Privacy Breach: Any access to or collection, use, disclosure or disposal of Personal Information that is not authorized by the Act, including the loss or theft of such information (e.g., when a computer is stolen or when Personal Information is mistakenly emailed to the wrong person).

Privacy Impact Assessment (PIA): An assessment performed by the College to evaluate the privacy impacts of existing or new College initiatives, systems or educational or administrative programs that involve the collection, use or disclosure of Personal Information, to determine whether they meet the privacy protection requirements of the Act.

Record: Documented information produced in the conduct of business in any media format, including print, digital, audio-visual and film, for the delivery of College programs and services; to carry out operations; to make decisions; and/or to account for activities. A Record must have value to be retained and serve as evidence of transactions, operations or events. Any Record created or obtained in the course of an Employee's duties at the College belongs to the College.

Routine Requests: Requests for categories of Records that are generally available upon request by an individual and that the College is authorized to disclose under the Act, including publicly available information; Records that have been provided by or previously released to the requester; and Personal Information about an individual released on the basis of consent from that individual.

Student: Includes all prospective, current and former Students of Douglas College.

D. POLICY STATEMENTS

1. Douglas College collects, uses and discloses Personal Information about its Employees, Students and members of the public for purposes related to and necessary for its programs or activities. In accordance with the requirements of the Act, Douglas College seeks to limit the scope and amount of Personal Information that it collects, uses and discloses to what is required in the circumstances, and shares Personal Information internally only on a need-to-know basis.

2. Information that Douglas College collects about its Students includes information such as name and contact information; information related to educational and employment history; academic performance information; test results; emergency contact information; information about conduct and disciplinary history; payment and financial information; and other information that Students voluntarily provide to the College.
3. Information that Douglas College collects about its Employees includes information such as name; contact information; employment and educational history; professional designations and qualifications; emergency contact information; financial and payment information; information related to Employee benefits; information about work performance and conduct; and medical and other information that may be relevant to employment.
4. Douglas College seeks to be transparent about how it collects and uses Personal Information, including by identifying to individuals the purposes for which their Personal Information will be collected and used in accordance with the requirements of the Act. Notice of the purposes for which Personal Information is collected will be provided at or before the collection takes place.
 - a. The Personal Information that the College collects about Students is used to
 - i. make decisions about eligibility for admission to an educational program;
 - ii. consider eligibility for financial aid, scholarships and other awards;
 - iii. administer and deliver educational services;
 - iv. communicate with Students about their programs and services;
 - v. evaluate and improve programs and services;
 - vi. conduct legitimate business purposes, such as administering programs and activities;
 - vii. investigate incidents and enforce the College's rules and policies; and
 - viii. comply with contractual, legal and/or regulatory obligations.
 - b. The Personal Information that the College collects about its Employees is used to
 - i. establish, manage, administer and end the employment or contractor relationship;
 - ii. evaluate Employee performance;
 - iii. investigate breaches of policy or other misconduct and take corrective measures;
 - iv. enable the paying of salary or administering of employment-related benefits;
 - v. evaluate and improve the College's employment-related programs and services;
 - vi. ensure the safety and security of College Employees and property; and
 - vii. comply with contractual, legal and/or regulatory obligations.
5. Douglas College protects Personal Information by implementing security safeguards appropriate to the sensitivity of the information, including through the use of the following measures:
 - a. Physical (i.e., locked filing cabinets, restricted access, appropriate security measures when disposing of Personal Information);
 - b. Organizational (i.e., security clearances, accessed only on a need-to-know basis);
 - c. Technological (i.e., passwords, firewalls, data disconnection from the internet, and regular backups); and
 - d. Training of Employees.

6. Douglas College makes reasonable efforts to ensure that the Personal Information it collects, uses and maintains is as accurate, complete and current as required for the purposes for which it was collected. In some cases, the College relies on Employees and Students to ensure that certain information about them (such as contact information) is current, complete and accurate. Individuals may correct their Personal Information online via MyAccount (Students) or Employee Self Service (Employees).
7. Douglas College recognizes that individuals have the right under the Act to request access to Records within the College's custody and control, including by requesting access to their own Personal Information maintained by Douglas College. Requests may be made in writing and directed to the Privacy Officer, and will be processed in accordance with the timelines and requirements of the Act.

Douglas College seeks to facilitate timely access to Records but in some cases may be required or authorized by the Act to withhold some requested Records or information, such as where

- a. the Records are privileged;
- b. the Records or information impact that privacy rights of a third party;
- c. the Records would harm a third party's commercial interests; or
- d. disclosure might give rise to safety or other risks.

Douglas College will make reasonable efforts to expedite the processing of Routine Requests where it determines that it is not necessary to withhold information from the requested Records.

8. Douglas College recognizes that, from time to time, certain of its programs and activities may take place in or involve individuals in jurisdictions outside of Canada. To the extent that the College's activities fall within the scope of foreign data protection laws, such as the General Data Protection Regulation (GDPR) applicable to individuals within the European Economic Community, the College endeavours to fully comply with such laws.

Where such foreign data protection laws apply, individuals may have access to other rights not applicable under the Act, such as the right to request the deletion or erasure of Personal Information; to object to how Personal Information is being processed by the College; to request data in a particular form or format; and to file complaints with foreign data protection authorities. For more information about such rights, please contact the College's Privacy Officer.

9. Douglas College supports the use of PIAs to evaluate the privacy implications of any new or revised initiatives at the College that involve the collection, use, disclosure, storage or maintenance of Personal Information.
10. Questions about this policy should be directed to Douglas College's Privacy Officer at privacy@douglascollege.ca.
11. The College will investigate and respond to complaints and Privacy Breaches as they arise, and report to the Office of the Information and Privacy Commission for British Columbia as necessary and appropriate.

E. PROCEDURES

See [Standard Operating Procedures \(SOPs\)](#) (for internal users)

- [Records and Information Management – Paper Records Storage SOP](#)
- [Records and Information Management – Records Destruction SOP](#)
- [Privacy Breaches \(Reporting and Responding to\) SOP](#)
- Privacy – Completing a Privacy Impact Assessment SOP [*under development*]

F. SUPPORTING FORMS, DOCUMENTS, WEBSITES, RELATED POLICIES

[Administration Policies](#)

- *Commercialization of Intellectual Property Policy*
- *Compliance with Canada's Anti-Spam Legislation Policy*
- *Information Security Policy*
- *Protected Disclosure (Whistleblower) Policy*
- *Records and Information Management Policy*
- *Safety and Security Camera Systems Policy*

[Douglas College Privacy and Access to Information Statement](#)

[Douglas College Records Retention Schedule](#) (for internal users)

G. RELATED ACTS AND REGULATIONS

- [Freedom of Information and Protection of Privacy Act \[RSBC 1996\], c. 165](#)

H. RELATED COLLECTIVE AGREEMENTS

- [Collective Agreement between Douglas College and Douglas College Faculty Association \(DCFA\)](#)
- [Collective Agreement between Douglas College and the BC Government and Service Employees' Union \(BCGEU\)](#)