



FOR INFORMATION

PUBLIC

OPEN SESSION

TO: Committee on Academic Policy and Programs Committee

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PRESENTER: Angelique Saweczko, University Registrar
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DATE: January 27, 2022 for February 17, 2022

AGENDA ITEM: 7

ITEM IDENTIFICATION:

Update to the Academic Records, Guidelines Concerning Access to Official Student Academic Records

JURISDICTIONAL INFORMATION:

The guidelines concerning access to the official student academic record are provided by the University Registrar to supports appropriate access to, and privacy of, official student academic records in accordance with the Freedom of Information and Protection of Privacy Act (FIPPA).

GOVERNANCE PATH:

1. Committee on Academic Policy and Programs [for information], February 17, 2022

PREVIOUS ACTION TAKEN:

Governance Consideration

The guidelines were originally provided for information in April 2008. This version updates and replaces the existing guidelines.

HIGHLIGHTS:

The University supports appropriate access to, and privacy of, official student academic records consistent with its commitment to the requirements of the Freedom of Information and Protection of Privacy Act (FIPPA). These guidelines update the university-wide procedures and criteria for access, privacy, custody, and retention of the academic records of students for academic divisions of the University to best support clarity and consistency of practice.

The guidelines were originally drafted in April 2008. Since this time, there have been amendments to FIPPA and the creation of student record retention guidelines. Updates to the guidelines ensure alignment with current FIPPA regulations (amended in 2020 and 2021) and recognize additional supporting documents available to support campus stakeholders who oversee student records. Highlights of the changes include:

- Updates to the definitions to provide clarity and to ensure alignment with the definition of a “student” as provided in the University of Toronto Act and the definition provided by Immigration, Refugees and Citizenship Canada (IRCC) for international students.
- Gender neutral language has been introduced throughout the document.
- References to medical information have been removed following consultation with the FIPPA Office as the current university process is to have student consent the provision of their personal health information, as per the PHIPA Act, for administrative purposes.
- Clarification and additional information regarding student information that can be accessed by the University Advancement to ensure alignment with FIPPA.

FINANCIAL IMPLICATIONS:

There are no implications for the university’s operating budget.

RECOMMENDATION:

For information.

DOCUMENTATION PROVIDED:

- Academic Records: Guidelines Concerning Access to Official Student Academic Records: Effective March 1, 2022 (Clean)
- Academic Records: Guidelines Concerning Access to Official Student Academic Records: Effective March 1, 2022 (Tracked Changes)

ACADEMIC RECORDS: GUIDELINES CONCERNING ACCESS TO OFFICIAL STUDENT ACADEMIC RECORDS

Academic Records: Guidelines Concerning Access to Official Student Academic Records

To request an official copy of this, contact:

The Office of the Governing
Room 106, Simcoe Hall
27 King's College Circle University of Toronto
Toronto, Ontario M5S 1A1

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GUIDELINES CONCERNING ACCESS TO OFFICIAL STUDENT ACADEMIC RECORDS

Issued by: University Registrar

Date: March 1, 2022

Purpose: The University supports appropriate access to, and privacy of, official student academic records consistent with its commitment to the requirements of the Freedom of Information and Protection of Privacy Act (FIPPA). These guidelines outline university-wide procedures and criteria for access, privacy, custody, and retention of the academic records of students of academic divisions of the University to best support clarity and consistency of practice.

1. For the purposes of these Guidelines:

- a) **Student** means any person registered at the University for full-time or part-time study in a program that leads to a degree or post-secondary diploma or certificate of the University or in a program designated as a program of post-secondary study at the University by the Governing Council or other University body having delegated authority. This includes students who are on a scheduled break or leave of absence from their program of study.
- b) **Alum** or **alumni** means any person who has received a degree or post-secondary diploma or certificate from the University.
- c) **Former student** means any person who is no longer considered a “student” (as defined in 1.a) or an “alum/alumni” (as defined in 1.b).
- d) **Permanent information** means information that the university maintains in perpetuity.
- e) **Impermanent information** means information that the university disposes of in accordance with the Undergraduate Student Records Retention Schedule and the School of Graduate Studies Record Retention and Disposition Schedule
- f) **Student Society** means a recognized student group as defined by the Policy for Compulsory Non-Academic Ancillary Fees.

2. Definition of the official student academic record

These guidelines pertain to student personal and academic information regardless of where, and in what medium, the information resides. The official student academic record consists of the following information relating to a student's admission to and academic performance at the University of Toronto:

(a) Permanent information

- 1) Personal information which is required in the administration of official student academic records such as legal name, student number, date of birth, citizenship, postal address, email address and telephone number.
- 2) Academic information such as degree name, specializations, results for each course attempted and registration status by academic term.
- 3) Academic progression decisions (or academic standing)
- 4) Credential received and date of conferral
- 5) Academic awards and honours received

(b) Impermanent Information

- 1) Narrative evaluations of a student's academic performance subsequent to their admission, used to judge their progress through an academic program.
- 2) Basis for a student's admission such as the application for admission and

supporting documents.

- 3) Results of petitions and appeals filed by a student.
- 4) Information relevant to a student's academic performance which has been furnished at the request or with the consent of the student concerned.
- 5) Letters of reference which may or may not have been provided on the understanding that they shall be maintained in confidence.

3. Access to Official Student Academic Records

(a) Access by a student

1) A student may examine and have copies made, at their own expense, of their official student academic record defined in Section 1 above, with the exception of those portions of the record which comprise letters of reference (Section 2(b) (5)) which have been provided or obtained on the expressed or implied understanding that they shall be maintained in confidence. A student may, however, be advised of the identity of the authors of any confidential letters contained in their official academic record.

2) A student's request to examine a part of their official student academic record shall be made in writing and shall be complied with by the responsible authorities within a division. Such compliance shall normally occur within 30 days of receipt of the request, or within such lesser period as a division may determine.

3) A student has the right to challenge the accuracy of their official student academic record and to have their official student academic record supplemented with comments so long as the sources of such comments are identified and the official student academic record remains securely within the custody of the academic division. Reference to such comments does not appear on reports such as transcripts or statements of results.

(b) Access by alumni and former students

1) An alum/alumni or a former student may examine and have copies made of the portion of their official student academic record as defined in Section 2(a) above.

2) A request from an alum/alumni or a former student to examine the portion of the official student academic record as defined in Section 2(a) shall be made in writing and shall be complied with by the responsible authorities within a division. Such compliance shall normally occur within 30 days of receipt of the request, or within such lesser period as a division may determine.

3) An alum/alumni or a former student shall have the right to challenge the accuracy of their official student academic record only under such terms and conditions as the academic division may determine and publish in the divisional calendar.

(c) Access by University Staff and members of official University and divisional councils and standing committees

- 1) Members of the teaching and administrative staff of the University and members of official University and divisional councils and committees shall have access to portions of an official student academic record only as they need it for purposes related to the performance of their duties, and where their access to it is necessary and proper in the discharge of the University's functions.
- 2) The Division of University Advancement (DUA) may access limited personal information of students to administer donor-related awards as noted in section 3.a. Information about alumni may be shared with DUA as necessary for alumni relations and fundraising purposes, which may include stewarding relationships with alumni and supporting or developing alumni communities and activities.
 - a. Donor related awards: Limited information includes student name, division/college, program(s) of study, years of attendance, and degree(s) obtained (if applicable). For additional details, see the *Privacy and the Use of Student Information: Guidelines for Advancement Staff* document provided in the *Related Documents* section.
 - b. Alum/alumni: Limited information includes student name, postal address, program(s) of study, years of attendance, division/college and degree(s) obtained.
 - c. Former students: Limited information may be made available in consultation with the University Registrar.

(d) Access by University campus organizations

1) University of Toronto Student Societies shall have access to the following information for the legitimate internal use of that organization: the name, address and telephone number of students who have been charged a compulsory non-academic incidental fee on behalf of the society. For purposes where an individual student's identity must be verified, additional information may be provided. The nature of the information, and the terms and conditions under which it will be provided, must be satisfactory to the Vice-President and Provost, or designate, and shall be reflected in formal confidentiality

agreements which provide that the information is strongly protected and used only for the purpose for which it is provided.

2) Names and addresses of students will also be provided to Student Societies for the purpose of distributing materials when all of the following conditions are met:

- The name and address information is not released to a third party (except as noted below).
- The name and address information is not used for commercial purposes.
- The organization proposes to distribute materials which, in the opinion of the University Registrar, the University would be willing to distribute if reimbursed by the organization. The materials to be distributed support or are related to the University or University activities and are not advertisements for non-University organizations.
- The campus organization enters into a confidentiality agreement which includes agreeing to use the name and address information only for the specific purpose for which it was provided. If materials are distributed by a third party (e.g., a mailing house) on behalf of the student society, the confidentiality agreement shall be between the University and the third party.

3) Notwithstanding other provisions of these guidelines, Student Societies which are also Representative Student Committees designated by the Governing Council that administer health and dental insurance plans may provide a list of the names, addresses, student numbers, faculty codes, date of birth and gender of students charged the compulsory non-academic incidental fee for the relevant plan to the insurance company designated by the student organization. The information included in the lists, and the terms and conditions under which they will be provided, must be satisfactory to the Vice-President and Provost, or designate, and shall be reflected in formal agreements which ensure that the information is adequately safeguarded and used only for the purpose for which it is provided. If it is demonstrated, to the satisfaction of the Vice-President and Provost, or designate, that the information is required for the administration of the plan and there is no practicable means for the information to be provided directly by the University to the insurance company, a similar list may be provided directly to the student organization under the same terms and conditions.

(e) Access by others

1) The public conferral of degrees, diplomas and certificates is a core activity of the University and the information included on the degree, diploma or certificate is personal information that is available to the general public.

2) All other information contained in the official student academic record, shall be released to other persons and agencies only with the student's prior express written consent, or on the presentation of a court order, or in accordance with the requirements of professional licensing or certification bodies, or the Ministry of Colleges and Universities for an annual enrolment audit, or otherwise as required by law. Requests for access granted to any persons or agencies outside the University to a student's academic record shall be kept on file within a division.

3) In the event that a student, alum/alumni or a former student is deceased, their personal representative shall be granted access to information in the individual's official student academic record to the extent that such access relates to the administration of the estate of the deceased.

(f) Refusal of access

The University reserves the right to withhold official transcripts, diplomas and/or degree certifications of students, alum/alumni and former students who have outstanding debts or obligations to the University in accordance with the Policy on Academic Sanctions for Students Who Have Outstanding University Obligations.

4. Custody and retention of official student academic records

(a) Academic records of students are normally under the custodial responsibility of the academic division. Every academic division maintaining official student academic records shall draw up plans for the eventual disposition of their records in consultation with the University Registrar and the University Archivist in accordance with the approved records retention schedule which is in compliance with this policy.

(b) Those portions of the official student academic record as defined in Section 2(a) shall be maintained permanently. Each academic division's records retention schedule shall specify the document, form or medium in which these records will be maintained.

(c) Official student academic records preserved in the University Archives because of their archival value shall become open to researchers authorized by the University thirty years after the student to whom they pertain has died.

(d) Academic records shall at all times be protected with effective security.

RELATED DOCUMENTS

[Freedom of Information and Privacy Act](#)

[Undergraduate Student Records Retention Guide](#)

[Staff Companion to the Undergraduate Student Records Retention Guide](#)

[Graduate Student Record Retention Guide](#)

[Privacy and the Use of Student Information: Guidelines for Advancement Staff](#)

ACADEMIC RECORDS: ~~GUIDELINES~~ CONCERNING ACCESS TO OFFICIAL STUDENT ACADEMIC RECORDS

~~Student~~ Academic Records: Guidelines Concerning Access to Official Student Academic Records

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~~DRAFT~~ GUIDELINES CONCERNING ACCESS TO OFFICIAL STUDENT ACADEMIC RECORDS

Issued ~~by~~: ~~Karel Swift~~ ~~University Registrar~~ [Registrar](#)

~~University Registrar~~

Date: ~~April 2, 2008,~~ [March 1, 2022](#)

Purpose: The University supports appropriate access to, and privacy of, official student academic records consistent with its commitment to the requirements of [the](#) Freedom of Information and Protection of Privacy Act (FIPPA). These guidelines ~~are intended to~~ outline university-wide procedures and criteria for access, privacy, custody, and retention of the academic records of students of academic divisions of the University ~~in order to~~ [best support ensure](#) clarity and consistency of practice.

1. For the purposes of these Guidelines:

- a) **Sstudent** means any person registered at the University for full-time or part-time study in a program that leads to a degree or post-secondary diploma or certificate of the University or in a program designated as a program of post-secondary study at the University by the Governing Council or other University body having delegated authority. This includes students who are on a scheduled break or leave of absence from their program of study. On the date of an enquiry or request relevant to this policy, persons who have been registered within a period of two calendar years shall be included in the provisions which relate to "students".
- b) **Aalumnus** or **alumnia** means any person who has received a degree or post-secondary diploma or certificate from the University, ~~or any person who has completed one year of full-time studies or the equivalent thereof as determined by the Governing Council, towards such a degree, diploma or certificate, and is no longer registered at the University.~~
- c) ~~F~~**former student** means any person who is no longer considered a "student" (as defined in 1.a) or an has been registered at the University in a program as defined in Section 2(a), has not been registered at the University within a period of two calendar years, and who is not an "alum/alumna" (as defined in 1.b).
- c) ~~Permanent information~~ means information that the university maintains in perpetuity.
- d) ~~Impermanent information~~ means information that the university disposes of in accordance with the Undergraduate Student Records Retention Schedule and the School of Graduate Studies Record Retention and Disposition Schedule
University of Toronto Retention and Disposition Schedule.
- e) **Student Society** means a recognized student group as defined by the Policy for Compulsory Non-Academic Ancillary Fees.

2. Definition of the official student academic record

These guidelines pertain to student personal and academic information regardless of where, and in what medium, the information resides. The official student academic record consists of the following information relating to a student's admission to and academic performance at this the University of Toronto:

- (a) Permanent information

1) Personal information which is required in the administration of official student academic records such as legal name, student number, date of birth, citizenship, social insurance number, postal address, email address and telephone number.

~~2) Academic information such as degree name, specializations, results for each course attempted and registration status by academic term~~ Registration and enrolment information.

~~3) Results for each course and academic period.~~

(3) Academic progression decisions (or academic standing)

(4) Credential received and date of conferral

(5) Academic awards and honours received

(b) Impermanent Information ~~used during the period of enrolment~~

14) Narrative evaluations of a student's academic performance subsequent to ~~his or her~~ their admission, used to judge ~~his or her~~ their progress through an academic program.

25) Basis for a student's admission such as the application for admission and supporting documents.

36) Results of petitions and appeals filed by a student.

47) ~~Medical~~ information relevant to a student's academic performance which has been furnished at the request or with the consent of the student concerned.

58) Letters of reference which may or may not have been provided on the understanding that they shall be maintained in confidence.

~~9) Personal and biographical information such as postal address, email address and telephone number.~~

3. Access to official student academic records

(a) Access by a student

1) A student may examine and have copies made, at his or her own expense, of their ~~his or her~~ official student academic record defined in Section 1 above, with the exception of those portions of the record which comprise letters of reference (Section 2(b) (58)) which have been provided or obtained on the expressed or implied

understanding that they shall be maintained in confidence. A student may, however, be advised of the identity of the authors of any confidential letters contained in their ~~his or her~~ official academic record.

2) A student's request to examine a part of their ~~his or her~~ official student academic record shall be made in writing and shall be complied with by the responsible authorities within a division. Such compliance shall normally occur within 30 days of receipt of the request, or within such lesser period as a division may determine.

3) A student has the right to challenge the accuracy of their ~~his or her~~ official student academic record and to have their ~~his or her~~ official student academic record supplemented with comments so long as the sources of such comments are identified and the official student academic record remains securely within the custody of the academic division. Reference to such comments does not appear on reports such as transcripts or statements of results.

(b) Access by alumni and former students

1) An alum/~~nus or alumna~~ or a former student may examine and have copies made of the portion of their ~~his or her~~ official student academic record as defined in Section 2(a) above.

2) A request from an alum/alumni ~~nus or alumna~~ or a former student to examine the portion of the official student academic record as defined in Section 2(a) shall be made in writing and shall be complied with by the responsible authorities within a division. Such compliance shall normally occur within 30 days of receipt of the request, or within such lesser period as a division may determine.

3) An alum/alumni ~~nus or alumna~~ or a former student shall have the right to challenge the accuracy of their ~~his or her~~ official student academic record only under such terms and conditions as the academic division may determine and publish in the divisional calendar.

(c) Access by University Staff and members of official University and divisional councils and standing committees

~~1) 4)~~ Members of the teaching and administrative staff of the University and members of official University and divisional councils and committees shall have access to portions of an official student academic record only as they need it for purposes related to the performance of their duties, and where their access to it is necessary and proper in the discharge of the University's functions.

~~2)~~

~~2) Access to medical information as defined in Section 2(b) (47) shall be granted to members of the teaching and administrative staff only with the prior express consent of the student.~~

~~3)~~

~~3) The Division of University Advancement (DUA) may shall have access to limited such personal information of students as necessary to administer who have been approved to graduate received donor--related awards as noted in section 3.a. Information about alumni may be shared with DUA as necessary for alumni relations and fundraising purposes, which may include students and or are considered and alumn/alumnii for the purpose of as is required for its own fundraising activities, such as stewarding relationships maintaining contact with alumni and supporting or developing alumni communities and activities.~~

~~a. Donor related awards: recipients: Limited This information includes student name, division/college, program(s) of study, years of attendance, and degree(s) obtained (if applicable). For additional details, see the Privacy and the Use of Student Information: Guidelines for Advancement Staff document provided in the Related Documents section.~~

~~b. , but does not include academic performance. Alum/alumni: Limited information includes student name, postal address, program(s) of study, years of attendance, division/college and degree(s) obtained.~~

~~a.c. Former students: Limited information may be made available in consultation with the University Registrar.~~

(d) Access by University campus organizations

1) University of Toronto Student Societies shall have access to the following information for the legitimate internal use of that organization: the name, ~~sessional~~ address, and telephone number of students who have been charged a compulsory non-academic incidental fee on behalf of the society. For purposes where an individual student's identity must be verified, additional information may be provided. The nature of the information, and the terms and conditions under which it will be provided, must be satisfactory to the Vice-President and Provost, or designate, and shall be reflected in

formal confidentiality agreements which provide that the information is adequately safeguardedstrongly protected and used only for the purpose for which it is provided.

2) Names and addresses of students will also be provided to Student Societies for the purpose of distributing materials when all of the following conditions are met:

- The name and address information is not released to a third party (except as noted below).
- The name and address information is not used for commercial purposes.
- The organization proposes to distribute materials which, in the opinion of the University Registrar, the University would be willing to distribute if reimbursed by the organization. The materials to be distributed support or are related to the University or University activities and are not advertisements for non-University organizations.
- The campus organization enters into a confidentiality agreement which includes agreeing to use the name and address information only for the specific purpose for which it was provided. If materials are distributed ~~In the event that the distribution of the materials is being conducted~~ by a third party (e.g., a mailing house) on behalf of the student society, the confidentiality agreement shall be between the University and the third party.

3) Notwithstanding other provisions of these guidelines, Student Societies which are also Representative Student Committees designated by the Governing Council that for the sole purpose of administering drug, health and dental insurance plans organized those Student Societies which are also Representative Student Committees as designated by the Governing Council, may provide a list of the names, addresses, student numbers, faculty codes, date of birth ~~dates~~, and gender of students charged the compulsory non-academic incidental fee for the relevant plan ~~may be provided~~ to the insurance company designated by the student organization. The information included in the lists, and the terms and conditions under which they will be provided, must be satisfactory to the Vice-President and Provost, or designate, and shall be reflected in formal agreements which ensure that the information is adequately safeguarded and used only for the purpose for which it is provided. If it is demonstrated, to the satisfaction of the Vice-President and Provost, or designate, that the information is required for the administration of the plan and there is no practicable means for the information to be provided directly by the University to the insurance company, a similar list may be provided directly to the student organization under the same terms and conditions.

(e) Access by others

1) The public conferral of degrees, diplomas and certificates is a core activity of the University and the information ~~on the face included on the degree, diploma or certificate of these records, together with the dates on which they were conferred,~~ is personal information that is ~~maintained for the purpose of creating a record that is~~ available to the general public.

2) ~~All~~ny other information contained in the official student academic record, shall be released to other persons and agencies only with the student's prior express written consent, or on the presentation of a court order, or in accordance with the requirements of professional licensing or certification bodies, ~~or~~ the Ministry of ~~Training,~~ Colleges and Universities for an annual enrolment audit, or otherwise as required by law. Requests ~~for access~~ granted to any persons or agencies outside the University ~~for access~~ to a student's academic record shall be kept on file within a division. ~~The release of the information concerning alumni and former students contained in the portions of the academic record as defined in Section 2(a) shall also be governed by the above provisions.~~

3) In the event that a student, alumn~~us or alumni~~a or a former student is deceased, ~~their his or her~~ personal representative shall be granted access to information in the individual's official student academic record to the extent that such access relates to the administration of the estate of the deceased.

(f) Refusal of access

The University reserves the right to withhold ~~the~~ official transcripts, diplomas and/or degree certifications of students, alumn~~a/alumni~~i and former students who have outstanding debts or obligations to the University in accordance with the Policy on Academic Sanctions for Students Who Have Outstanding University Obligations.

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(a) Academic records of students are normally under the custodial responsibility of the academic division. Every academic division maintaining official student academic records shall draw up plans for the eventual disposition of their records in consultation with the University Registrar and the University Archivist in accordance with ~~the an~~ approved records retention schedule which is in compliance with this policy.

(b) Those portions of the official student academic record as defined in Section 2(a) shall be maintained permanently. Each academic division's records [retention](#) schedule shall specify the document, form or medium in which these records will be maintained.

(c) Official student academic records preserved in the University Archives because of their archival value shall become open to researchers authorized by the University thirty years after [the a-student to whom they pertain](#) has died.

(d) Academic records shall ~~be kept~~ at all times [be protected with](#)under appropriate [effective](#) security.

RELATED DOCUMENTS ~~(added for reference by the Secretariat, January 14, 2020)~~

[Freedom of Information and Privacy Act](#)

[Undergraduate Student Records Retention Guide](#)

[Staff Companion to the Undergraduate Student Records Retention Guide](#)

[Graduate Student Record Retention Guide](#)

[Privacy and the Use of Student Information: Guidelines for Advancement Staff](#)

DRAFT