



CONFIDENTIALITY OF STUDENT INFORMATION AND RECORDS

Classification:	Administration
Responsible:	All Team Members of The Learning Company
Executive Sponsor:	Director
Approval Authority:	Director
Date First Approved:	June 1, 2021
Date Last Reviewed:	July 31, 2024
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A. PURPOSE

The Confidentiality of Student Information and Records Policy describes how The Learning Company uses and protects individual's personal information, in compliance with the Freedom and Protection of Privacy Act (FIPPA) and the General Data Protection Regulation (GDPR) legislation.

B. SCOPE

This Policy applies to all personal information collected around students enrolled in The Learning Company classes and programs.

C. DEFINITIONS

The Freedom of Information and Protection of Privacy Act (FIPPA)

The Freedom of Information and Protection of Privacy Act (FIPPA) is a law that protects individual's rights to access records held by public bodies and requires that public bodies protect the privacy rights of individuals.

Personal Information

Personal Information is information that is recorded about an individual such as address, age, social security number, etc., as defined by FIPPA, which is held within the Student Record.

Public Body

A Public Body is defined by FIPPA as but not limited to, a government department, government agency, office of a minister, an educational body, a health care body, the City of Brandon, a municipality, or any other organization as a public body.

Student

A student is an individual who has applied for admission, is currently enrolled, or has previously been a student at The Learning Company.



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Student Record

A Student Record is the information which is contained within a student's file which may include personal information, admission, registration, academic, and disciplinary history at The Learning Company.

Detailed contents of the student record are in Appendix I.

Third Party

A Third Party is any individual or business who is not a student or The Learning Company faculty or staff. This may include a spouse or common-law partner, parents or guardians of the student, professional organizations, financial institutions, and credit agencies.

D. POLICY

The protection, security and confidentiality of personal information is an essential task of the College. The Personal Information and Student Records which The Learning Company will collect, use and disclose will be aligned with law and the policies set out in this document.

1. DATA PROTECTION

The Learning Company protects the safety of personal information stored in both technology and paper-based formats. Academic Records are kept in a number of controlled locations at the College, including: academic and student support offices. The Learning Company faculty and administrative staff are responsible for restricting the use and disclosure of Personal Information in accordance with this policy and FIPPA.

By submitting information related to the application process or registering at the College, Students give their consent to the College to:

- a. Compile Personal Information into an Academic Record; Use their Personal Information where required for College operations and in accordance with FIPPA;
- b. and Disclose Personal Information where required by College operations and in accordance with FIPPA or other applicable laws.

2. DISCLOSURE OF INFORMATION TO A STUDENT

- 2.1 A student may have access to their Academic Record upon written request.
- 2.2 The College may refuse to grant access to all or part of the personal information requested in accordance with applicable legislation.
- 2.3 A student who has been granted access to their Academic Record may not change or remove documents.
- 2.4 The student has the right to correct any incorrect personal information in the Academic Record.



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3. DISCLOSURE TO THE LEARNING COMPANY INSTRUCTORS OR STAFF

The Learning Company faculty and staff who have a legitimate need to access a student's Personal Information or Academic Record may have access to the sections related to their College duties. Use and disclosure of Personal Information will be limited to the minimum amount of Personal Information necessary to accomplish the purpose for which it is used or disclosed.

4. DISCLOSURE TO THIRD PARTIES

- 4.1 The Learning Company will only disclose matters of public record to Third Parties. This may include information about academic awards, earned diplomas, etc.
- 4.2 Student's Personal Information will not be disclosed to a Third Party unless the student has given written consent, or unless disclosure is required by law.

E. RELATED LEGISLATION

Freedom of Information and Protection of Privacy Act (FIPPA)

General Data Protection Regulation (GDPR)

Personal Health Information Act (PHIA)

Children's Online Privacy Protection Act (COPPA)

F. PROCEDURE

None

G. SUPPORTING DOCUMENTATION

Appendix 1: Contents of the Student Record

H. RELATED POLICIES

None

I. RELATED MATERIALS

None

Approved: July 31, 2024

Approved by: The Learning Company Leadership Team

Travis Chastko
Owner

Amy Kilburn
Director



APPENDIX I: Contents of the Student Record

Unless otherwise noted, the student record is held in electronic format by the Registrar's Office.

1. Current Record

1.1. Pre-registration Record

When a potential learner applies to the College, and before registration, the following information comprises their official record. Following registration, this information becomes the current record:

- Application form and its documentation and admissions correspondence;
- Program admissions assessments;
- Record of program choice and changes to program choice;
- Record of changes to personal information;
- Receipt of payment of fees;
- Letters from sponsors;
- Requests for accommodations;
- Written release of personal information to specified third parties.

1.2 Registered Students

When a student is currently enrolled at the College, the following information comprises their official record:

- Application form and its documentation and admissions correspondence;
- Record of changes to personal information;
- Record of registration and changes to registration;
- Student enrollment contract;
- Record of assessment and payment of fees and penalties;
- Cumulative record of grades;
- Written release of personal information to specified third parties.
- Record of withdrawal;
- Record of requests for transcripts;
- Record of academic appeals;
- Documentation of student status, including record of disciplinary action, letters from sponsors, student correspondence;
- Anecdotal description of student progress in specific programs;
- Record of graduation, certification awarded, graduation date.

1.3 Permanent Record

The permanent record is comprised of:

- Student's full legal name (including previous name if on file);
- Student ID number
- Social Insurance number;
- Date of birth;



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- Last permanent address;
- Student enrollment contract;
- Cumulative academic record that consists minimally of this information:
 - Date of admission;
 - Program Cohort,
 - Titles of courses in which the student registered, and that comprise the program;
 - Final grade in each course;
 - Cumulative grade average;
 - Graduation status and date, or leaving status and date.

2. Retention of Records

2.1 Context

Legislation and regulation for licenced Private Vocational Institutions in Manitoba requires institutions to retain student enrollment contracts, transcripts and certificates or diplomas for 25 years. The Learning Company retains the permanent student record indefinitely.

2.2 Current student test and assignment records are held for a period of 6 months after the student's last academic activity, after which time they are destroyed.

2.3 Special records

a) **Transcripts and records from other institutions** are held on the student record to support the admissions process, and other admissions-related decisions.