

CCS Privacy Policy

Purpose

CCS collects and gathers personal information

- to comply with regulations set out by the Government of Canada, The United Church of Canada and the Anglican Church of Canada for an educational institution.
- To administer transactions such as the creation of donation receipts.
- To build strong relationships within the community.

The purpose of this policy is to protect the privacy of collected personal information.

Policy

CCS collects and retains personal information of students, alumni/ae, staff and other parties associated with CCS. This information is used for the academic, administrative, employment-related, financial and statistical purposes of CCS, including for the administration of admissions, registration, awards and scholarships, graduation, alumni/ae relations and other fundamental activities related to being a member or supporter of the CCS community, a user of services provided by CCS or an attendee of CCS events. The information will be used, among other things, to admit, register and graduate students, record academic achievement, issue library cards and to operate academic, financial, alumni/ae and other CCS programs. Information on admissions, registration and academic achievement may also be disclosed and used for statistical and research purposes by the United and Anglican Churches, other affiliated educational institutions and the federal and provincial governments. The names of alumni/ae, award information, diplomas or certificates awarded and date of graduation are considered public information and may be published by CCS. In addition, student photographs posted by CCS in the form of individual pictures or class pictures may be publicly displayed.

Protocol

1. Definitions

Personal Information means information about an identifiable individual, and includes things such as gender, age, address information, ethnicity, financial information, registration, course, educational credit and grades information, ID numbers and any other data assigned to an individual.

Summarized Data means records which have been manipulated or combined to provide generalized or aggregated information.

Business contact information and publicly available information (e.g. telephone directories) are not considered private information.

2. Personal Information

a) Employees

Purpose for Collection: To maintain records of employment for all human resource activities including hiring, employee evaluation, employee health and welfare, salary and benefits, pensions, etc.

Information: Personal information may include the following: name; address; home telephone number; fax number; e-mail address; date of birth; gender; marital status; SIN; health information; employment history; educational information; library records including card identification; academic records; transcripts; appointment and promotion information; resume; application documents; letters of reference; contract; performance appraisal; recommendation for tenure or continuing appointment; leave applications; correspondence on terms/conditions of employment and discharge of duties; disciplinary material; salary and benefits; pension; financial information; record of employment; vacation and sick leave information; group insurance claims.

Within CCS, this information may be shared with the Principal and Human Resources Committee. Administrative staff may also have access to this information for secretarial, filing, records and library purposes. Application information will be shared with the General Council and General Synod staff representatives for Theological Education.

b) Students:

Purpose for Collection: To create and maintain student records for enrollment and support purposes.

Information: Personal information may include the following: name; address; home telephone number; fax number; e-mail address; date of birth; gender; marital status; religion; SIN; health information; employment history; educational history; library records including card identification; application; correspondence; letters of reference; transcripts; registration information; course add/delete; sessions attended; student number; academic performance; awards; appeals; academic misconduct; disciplinary information; academic advising; counseling and medical records; financial information; sponsorship; scholarships, grants and awards.

Within CCS information may be shared with staff responsible for admissions, student records, library, those administering bursaries and student services, and externally, as necessary for students with dual enrollment with schools which offer joint degree programs with CCS, and with church judicatory bodies sponsoring students.

c) Alumni/ae:

Purpose for Collection: To create and maintain records for historic records, for ongoing connections and for soliciting of funds.

Information: In addition to the Personal information collected while the individual was a student, information may be collected on changes in the following: name; address; home telephone number; fax number; e-mail address; marital status; religion; employment history; educational history; as well as correspondence; and other information relevant to the keeping of accurate records of alumni/ae.

Within CCS, this information may be shared with those staff responsible for historic records, alumni/ae relations, public relations, and fund raising. Administrative staff may also have access to this information for secretarial, filing, records and library purposes.

d) Volunteers, Supporters, and Donors:

Purpose for Collection: To create and maintain records for historic records, for ongoing volunteer support, for connections and for soliciting of funds.

Information: Personal information may include the following: name; address; home telephone number; fax number; e-mail address; religion; library records including card identification; correspondence; financial information for donors relevant to the keeping of accurate records of donors; employment history and educational history for volunteers related to the educational components of the program.

Within CCS, this information may be shared with those staff responsible for historic records, public relations, fund raising, educational programming and volunteer management. Administrative staff may also have access to this information for secretarial, filing, records and library purposes.

3. CCS practices:

- a) It is CCS practice to collect personal information directly from the individual the information is about. At the time the information is collected, CCS shall inform the individual of
 - (i) the purpose for which the information is collected;
 - (ii) the legal authority for the collection; and
 - (iii) the title, business address and telephone number of an officer or employee of CCS who can answer the individual's questions about the collection.
- b) CCS takes reasonable steps to ensure that Personal Information is kept safe from loss, unauthorized access, modification, or disclosure.

- c) CCS Volunteers who may have access to personal information will be asked to sign a confidentiality contract.
- d) CCS does not sell or trade Personal Information or give other bodies access to its mailing lists.

4. Access to personal information

- a) Individuals have a right of access to records containing personal information about themselves in the custody of CCS, subject to limitations, unless access to that information will or will likely cause an unreasonable invasion of a third party's privacy.
- b) Individuals have a right to request corrections to records containing personal information about themselves in the custody of CCS.
- c) To obtain access to a record, a person must make a request to the Principal in writing.
- d) If the applicant has asked for a copy and the record can reasonably be reproduced, the principal may give the applicant a copy of the record; or if the applicant has asked to examine a record or has asked for a copy of a record that cannot reasonably be reproduced, the Principal may permit the applicant to examine the record or a part of it or by giving him or her access in accordance.
- e) An applicant who has been given access to a record containing his or her personal information and who believes there is an error or omission in the information may request the Principal, in writing, to correct the information.
- f) Within 30 days after receiving a request the Principal shall
 - (i) make the requested correction and notify the applicant of the correction; or
 - (ii) notify the applicant of the Principal's refusal to correct the record and the reason for the refusal, that the request for correction has been added to the record, and that the individual has a right to make a complaint about the refusal to the Human Resources Committee.

5. Disclosures

Under certain circumstances, CCS will disclose Personal Information:

- a) when the individual has consented to the disclosure;
- b) to fulfill the purpose for which the Personal Information was collected or for a purpose reasonably consistent with that purpose;
- c) when the services CCS is providing to the person requires CCS to give information to third parties, such as the educational institutions with which a student is registered, church judicatory bodies or governmental bodies;
- d) where it is necessary to collect fees;
- e) if CCS engages a third party to provide services (such as computer back-up services, archival file storage, or client research) and the third party is bound by confidentiality obligations;

- f) if the information is already publicly known; and/or
- g) when CCS is required or authorized by law to do so.

CCS may also use Personal Information to generate Summarized Data for internal use and for sharing with educational institutions and government bodies with which CCS does business. Individual's identity and Personal Information will be kept anonymous in Summarized Data. Summarized Data may be used for research, marketing, or planning purposes.

6. Privacy Breaches

The most common privacy breaches happen when personal information about students, constituents or employees is stolen, lost or mistakenly disclosed. The Manitoba Ombudsman has identified four key steps for public bodies to take in responding to a breach. These steps will guide CCS actions in case of a breach: contain the breach, evaluate the risks associated with the breach, decide who to notify about the breach (this may include affected individuals, police, technology providers, regulatory bodies), and take steps to prevent future breaches.

7. Disposal of private information

Educational institutions may dispose of personal information in the following ways only:

- a) By destroying the personal information.
- b) By transferring it to the archives of another educational institution, in accordance with an agreement between the educational institutions authorizing the transfer.
- c) By transferring it to the provincial or church Archives.

8. Consent

By providing Personal Information to CCS, people voluntarily consent to the collection, use and disclosure of Personal Information as specified in this policy. Without limiting the foregoing, CCS may on occasion ask for written or oral consent when CCS collects, uses, or discloses Personal Information in specific circumstances. Sometimes consent will be implied through a person's conduct with CCS if the purpose of the collection, use, or disclosure is obvious and the person voluntarily provides the information. In addition, CCS may collect, use, and disclose Personal Information without consent when required or authorized by law to do so.