

CCTCM Student Records Management Policy

Status	Draft — approval pending receipt of Ministerial consent
Approving Body	Academic Council
Date Adopted	Pending
Effective Date	Pending
Date of Last Review	N/A
Supersedes	N/A

1. Purpose

The Canadian College of Traditional Chinese Medicine (CCTCM) is committed to managing student records with the highest standards of confidentiality, security, and compliance with applicable legal requirements. This policy establishes procedures for the collection, storage, access, maintenance, retention, and disposal of student records in accordance with Ontario ministerial consent requirements.

2. Scope

This policy applies to all student records maintained by CCTCM, whether in physical or electronic format, and to all employees, contractors, and agents who have access to student records.

3. Collection of Records

Student records are collected only for legitimate educational and administrative purposes, with the knowledge and consent of the student. Consent for the collection and use of records is established through the Student Enrolment Contract signed at the time of registration. Students are informed at the time of collection about the purpose for which information is being collected and how it will be used.

All student records include, at minimum:

- Lawfully collected personal identifying information
- The basis on which the student was admitted
- Academic awards and honours received by the student
- Academic actions taken with respect to the student
- The degree awarded and the date on which it was conferred
- The student's academic history
- The name of and contact information for the Academic Dean or similar official responsible for student records

For international students requiring a study permit, the restricted student file also contains the following:

- Full name, sex and date of birth

- Canadian address and accommodation type
- Canadian and permanent-address telephone contacts
- Email address
- Country of origin and citizenship
- Primary language
- Admission-test and academic-evaluation results
- Signed student contract
- Evidence of health insurance before the program begins
- Study-permit number
- Entry date and expiry date, as applicable.

4. Storage and Security

Physical Records

Physical records are stored in locked, secure cabinets in restricted-access areas. Access is limited to authorised personnel only, and facilities are equipped with appropriate security measures.

Electronic Records

Electronic records are stored using robust software systems that allow for future growth in the amount of data to be stored. Electronic records are maintained on secure servers with encryption and access controls, protected against unauthorised access, alteration, or breach. Regular security updates and monitoring are implemented.

Backup Requirements

All electronic student records are backed up at an off-site location at least weekly to ensure preservation and accessibility in the event of system failure, disaster, or institutional closure.

Record Accuracy Certification

The Academic Dean (or designate) certifies the accuracy of student records on an ongoing basis and ensures all records are maintained in accordance with this policy and applicable legal requirements.

5. Access and Confidentiality

Access Restrictions

Access to student records is limited to authorised personnel who have a legitimate educational or administrative need to access the information. All personnel with access to student records are trained on confidentiality obligations and privacy requirements.

Student Access

Students have the right to review their own records upon written request. CCTCM will provide access within a reasonable period, not exceeding thirty (30) days from receipt of the request. Students may be charged a reasonable fee for copies of their records.

Student academic transcripts and core records are retained permanently, ensuring that records remain accessible to students and former students indefinitely.

Official transcripts for current and former students are provided without charge, normally within five (5) business days, through the Administration Office.

Confidentiality

Confidentiality of student records is maintained at all times. Information is not disclosed to third parties without the student's written consent, except:

- As required by law or court order
- In emergencies where the information is necessary to protect the health or safety of the student or others
- To authorised government agencies for regulatory or compliance purposes
- To accrediting bodies as required for accreditation purposes
- As otherwise permitted under applicable privacy legislation

6. Updating and Correction of Records

CCTCM ensures that student records are accurate and up to date. Students may request corrections to their records by submitting a written request with evidence of inaccuracies. CCTCM will review correction requests and respond within fifteen (15) business days.

If a correction is warranted, the record will be amended promptly. If CCTCM determines that no correction is warranted, the student will be notified in writing of the decision and their right to include a statement of disagreement in the record. All corrections or updates are documented, and relevant parties are notified as appropriate.

The Administration Office collects addresses, telephone numbers and email addresses through the registration form and requests confirmation once each year, including confirmation that unchanged details remain correct. Students notify the Administration Office when their details change. Administrative staff update the record, record the update date, and follow up by telephone and email where messages are returned or a student cannot be reached.

7. Retention and Disposal

Retention Periods

Student academic transcripts and records containing the minimum required information specified in §3 are retained permanently.

Student application and admission records, student financial records, and student disciplinary records are retained for five (5) years after last date of attendance or resolution of the matter. Other student records are retained for five (5) years after last date of attendance, or as required by applicable law and accreditation standards.

Retention periods comply with Ontario Student Record (OSR) guidelines, ministerial consent requirements, and applicable legal requirements.

Disposal

Records that have exceeded their retention period are disposed of securely. Physical records are disposed of through shredding or other secure destruction methods that render information irretrievable. Electronic records are permanently erased using secure deletion methods that prevent data recovery. A record of disposal is maintained, including the date of disposal and a description of the records destroyed.

Academic transcripts and core records retained permanently under this policy are not subject to disposal.

8. Breach Notification

College IT investigates technical aspects of a suspected loss, misdirection or disclosure of student information. The Director and Academic Dean coordinate the institutional response and the steps below.

In the event of a suspected or confirmed breach of student record security, CCTCM will take the following steps:

- Contain the breach and take immediate steps to prevent further unauthorised access
- Investigate the nature and scope of the breach, including the records and individuals affected
- Notify affected students in writing as soon as reasonably practicable, including a description of the breach, the information involved, and the steps being taken in response
- Where required by applicable privacy legislation, notify the Information and Privacy Commissioner of Ontario
- Document the breach, the investigation, and all remedial actions taken
- Review and strengthen security measures to prevent recurrence

9. Third-Party Record Keeper

CCTCM has designated Career Colleges Ontario as the third-party record keeper to maintain student records in the event that CCTCM closes or can no longer, for any reason, maintain the records.

The third-party record keeper agreement ensures:

- Continued accessibility of records to students for the required retention period
- Maintenance of confidentiality and security standards equivalent to those in this policy
- Compliance with all applicable privacy legislation
- Notification procedures to students and the Ministry in the event of institutional closure

The agreement with the third-party record keeper is reviewed annually and updated as necessary.

10. Privacy Legislation Compliance

This policy complies with applicable privacy legislation, including the *Freedom of Information and Protection of Privacy Act* (FIPPA) and the *Personal Information Protection and Electronic Documents Act* (PIPEDA), as applicable.

11. Related Policies

- Academic Probation and Dismissal Policy
- Admissions and Credit Transfer Policy
- Attendance and Evaluation Policy
- Student Complaint and Appeal Policy

12. Policy Review

This policy shall be reviewed every three (3) years, or sooner as necessitated by changes in regulatory requirements or institutional circumstances.

13. Contact Information

For questions about this policy or to request access to records:

Administration Office

Canadian College of Traditional Chinese Medicine

Phone: 905-606-0062

Email: info@cctcm.ca