


Policy Name:	FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY	 coast mountain college
Approved By:	Board of Governors	
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Policy Holder:	President's Council	
Operational Lead:	Director, President's Office	
Policy Number:	ADM-003	

FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY POLICY

1.00 PURPOSE

- 1.1 Coast Mountain College (the College) respects the privacy of all individuals whose personal information it collects, uses, discloses, or retains. As a public body, the College's records are subject to the [BC Freedom of Information and Protection of Privacy Act](#) (FOIPPA).
- 1.2 The College is committed to maintaining policies and practices that align with the [BC College and Institute Act](#) and FOIPPA. Through the application of recognized privacy best practices, the College seeks to meet legislative requirements for protecting personal information and ensuring responsible information management across all departments and operations.

2.00 DEFINITIONS

- 2.1 **Access Request:** A written request made under FOIPPA for access to records under the College's custody or control.
- 2.2 **Applicant:** The individual or organization requesting access to records under the College's custody or control.
- 2.3 **Correction Request:** A request from an individual to correct their personal information that is held by the College.
- 2.4 **Employee:** A person who is employed by the College, including administrators, faculty members, staff, contractors, and students when employed by the College (e.g., as student assistants).
- 2.5 **Personal Information:** Recorded information about an identifiable individual, other than contact information used for business purposes.

Personal information includes, but is not limited to: an individual's name; home address and telephone number; age; sex; marital or family status; identifying numbers; race, national or ethnic origin; religious or political beliefs or associations; educational, medical, financial, or criminal history; anyone else's opinions about the individual; the individual's own personal views or opinions; and the name, address, or telephone number of a parent, guardian, spouse, or next of kin.

- 2.6 **Privacy Breach:** Any unauthorized access, collection, use, disclosure, loss, or destruction of personal information.
- 2.7 **Privacy Impact Assessment (PIA):** A structured risk assessment conducted to ensure a program, activity, or system complies with FOIPPA and safeguards privacy.
- 2.8 **Privacy Officer:** The senior official designated to oversee and manage all privacy-related matters at the College.
- 2.9 **Record:** Any recorded information, in any form, that is created, received, or maintained by the College.

A record includes books, documents, maps, drawings, photographs, letters, vouchers, papers, and all forms of electronic or digital information such as emails, text messages, audio recordings, video recordings, and photographs. A record also includes any other item on which information is recorded or stored by graphic, electronic, digital, mechanical, or other means.

A record does not include a computer program or any other mechanism that produces records.
- 2.10 **Student:** An individual who is registered in, or applying to, any course or program at the College. This includes individuals enrolled in part time studies, individuals participating in Continuing Education and Workforce Training, and individuals registered through contract services or partnership arrangements such as dual credit or dual admission. This definition applies to Students engaged in College activities on site or off site. Individuals employed by the College in any capacity and registered in a program or course will be considered as an Employee under this policy.
- 2.11 **The College:** Coast Mountain College (CMTN).
- 2.12 **Third-Party Service Provider:** Individuals, companies, or organizations external to the College that are engaged to perform services or functions on behalf of the College and who may collect, access, use, disclose, store, or manage College records or personal information in the course of providing those services.
- 2.13 **Volunteer:** An individual who provides services to the College and who is not an employee, student, or contractor, but who may have access to College facilities, or personal information in the course of their assigned duties.

3.00 SCOPE

- 3.1 This policy applies to all:
 - a. personal information under the custody or control of Coast Mountain College (the College)
 - b. employees, volunteers, and third-party service providers who collect, access, use, disclose, or manage personal information on behalf of the College
 - c. systems, programs, and activities that involve the collection, storage, use, disclosure, retention, or destruction of personal information, whether in paper or electronic formats.
- 3.2 This policy does not apply to:
 - a. business contact information that is collected, used, or disclosed solely for employment-related purposes

- b. records excluded under FOIPPA.

4.00 ACCOUNTABILITY

- 4.1 The President & Chief Executive Officer (CEO), as head of the public body under FOIPPA, is ultimately accountable for compliance with privacy legislation.
- 4.2 The Privacy Officer is formally designated by the President & CEO to administer the privacy management program, develop operational procedures, and serve as the primary contact for privacy matters.
- 4.3 Each Department Manager is responsible for integrating privacy protection into daily operations and ensuring that employees understand and comply with this policy.
- 4.4 All Employees are required to comply with this policy and associated procedures and must complete mandatory privacy training, as required by the College.

5.00 PRIVACY MANAGEMENT PROGRAM

- 5.1 The College will create and maintain a comprehensive privacy management program to support ongoing compliance with FOIPPA and to ensure the responsible management of personal information across all departments
 - a. The program will be reviewed regularly to ensure its effectiveness.

6.00 PURPOSES FOR COLLECTING PERSONAL INFORMATION

- 6.1 The College will collect personal information only when it is directly related to, and necessary for, its programs, services, or operational functions, or when authorized by law.
- 6.2 At or before the time of collection, individuals will be informed of:
 - a. the purpose for which their information is being collected
 - b. the legal authority permitting the collection (usually FOIPPA, s. 26)
 - c. a contact person who can answer questions, typically the Privacy Officer.
- 6.3 Personal information will only be collected:
 - a. with the consent of the individual, preferably in writing
 - b. directly from the individual
 - c. Student personal information may be collected directly from the Student and, when appropriate, from other authorized sources such as Employees, the provincial government, high schools, or witnesses involved in investigations, legal guardian when appropriate.
- 6.4 Collection activities must be limited to the minimum amount of information required to fulfill a legitimate and defined purpose.
- 6.5 Departments introducing new forms or systems that collect personal information must consult the Privacy Officer to ensure appropriate notice language and retention planning.

7.00 USE AND DISCLOSURE

- 7.1 Personal information will be used and disclosed only for the purpose for which it was collected or for a use consistent with that purpose, as defined by FOIPPA s. 34.

- 7.2 Disclosure without consent will occur only when authorized or required by law or during a medical emergency.
- 7.3 Before any new or modified use or disclosure of personal information, the responsible department must consult the Privacy Officer to determine whether a privacy impact assessment (PIA) is required.
- 7.4 All third-party service providers who handle personal information on behalf of the College must safeguard all personal information consistent with FOIPPA and this policy.

8.00 RETENTION AND DELETION

- 8.1 Personal information will be retained only for as long as necessary to meet operational, legal, fiscal, archival requirements.
- 8.2 Retention periods will be established and maintained under [ADM-011, Records Management Policy](#).
- 8.3 When personal information is no longer required, it must be securely destroyed.
- 8.4 Acceptable destruction methods include:
 - a. paper records: cross-cut shredding or certified confidential destruction
 - b. electronic records: secure erasure, degaussing, or certified digital wiping
 - c. cloud-based data: deletion confirmed through service provider certification.
- 8.5 Destruction must be documented and conducted under the supervision of the responsible department manager to ensure compliance and accountability.

9.00 PERSONAL INFORMATION SAFEGUARDS

- 9.1 The College will protect personal information through appropriate administrative, physical, and technological safeguards that correspond to the sensitivity and format of the information.
 - a. Administrative safeguards include privacy and records management policies, confidentiality agreements, training, and access controls based on business need-to-know.
 - b. Physical safeguards include secure work areas, locked filing systems, controlled access to offices, and restricted access to areas where sensitive information is processed or stored.
 - c. Technological safeguards include secure authentication, encryption, network security monitoring, and incident-response mechanisms.
- 9.2 The Director of Information Technology and Chief Information Officer (CIO) is responsible for implementing and maintaining technical security measures, while department managers are responsible for ensuring that local administrative and physical safeguards are in place.
- 9.3 Security measures will be reviewed periodically, particularly after incidents, audits, or technology changes, to ensure continued effectiveness.

10.00 ACCESS TO INFORMATION

- 10.1 In accordance with FOIPPA, individuals have the right to request access to records in the custody or under the control of the College, including records containing their personal information.
 - a. Individuals also have the right to request correction of their own personal information when it is inaccurate or incomplete.
- 10.2 The Privacy Officer will respond to access requests in writing within legislated timelines, explaining any decision to grant, deny, or partially withhold access.
- 10.3 Departments must cooperate promptly with the Privacy Officer to locate and provide records responsive to access requests.

11.00 ACCESS FOR RESEARCH, STATISTICAL, ARCHIVAL, OR HISTORICAL PURPOSES

- 11.1 Access to personal information for research, statistical, archival, or historical purposes may be permitted only in accordance with FOIPPA. Such access requires that all conditions set out in the Act are met.
- 11.2 The Province requires post-secondary institutions to collect certain student information for evaluation and accountability purposes, and Students are informed of these requirements at the time of application.

12.00 ACCESS TO EMPLOYEE INFORMATION

- 12.1 In accordance with FOIPPA, certain job-related information about employees may be disclosed routinely.
 - a. This includes information that relates to an employee's position or functions within the College, specifically:
 - i. the employee's position or job title
 - ii. the duties, responsibilities, and functions of the position
 - iii. the employee's remuneration, as permitted under FOIPPA or other applicable law.

13.00 COLLEGE WEBSITE

- 13.1 Use of the College's website is generally anonymous, except where user authentication or sign-in is required.
 - a. When individuals choose to submit personal information through the website, they are deemed to have provided consent for the College to collect and use that information for the purposes identified at the point of collection.
- 13.2 The College may collect basic identification and technical data from website visitors for security, statistical analysis, and reporting purposes.
 - a. This information is used to support system integrity and improve website functionality.
- 13.3 In accordance with FOIPPA, the College does not disclose information about website visitors to external organizations or individuals unless authorized by law.

14.00 CONCERNS AND COMPLAINTS

- 14.1 The College encourages individuals to bring forward privacy concerns or complaints in good faith.
- 14.2 The Privacy Officer will handle all complaints promptly, fairly, and in accordance with FOIPPA.
 - a. Individuals may submit a privacy concern or complaint by email to foi@coastmountaincollege.ca.
- 14.3 When the complainant is not satisfied with the College’s response, they may request an independent review by the [Office of the Information and Privacy Commissioner for British Columbia](#) (OIPC-BC).

15.00 COMPLIANCE AND DISCIPLINE

- 15.1 Compliance with this policy and FOIPPA is a condition of employment at the College.
 - a. All employees, and volunteers are expected to understand and adhere to their privacy responsibilities.
- 15.2 Failure to comply with this policy, related procedures, or FOIPPA may result in disciplinary action, up to and including termination of employment or contract.
 - a. In cases involving willful or negligent privacy breaches, the College may also pursue legal remedies or report the matter to the appropriate authorities.

16.00 RELATED POLICIES, PROCEDURES, AND GUIDELINES

- 16.1 ADM-003P, *Freedom of Information and Protection of Privacy Procedure*
- 16.2 [ADM-011, Records Management Policy](#)
- 16.3 [HMR-001, Employee Code of Conduct Policy](#)
- 16.4 [INF-001, Acceptable Use of Information Resources Policy](#)
- 16.5 [INF-003, User Account Management Policy](#)
- 16.6 [INF-005, College Data Classification Policy](#)

17.00 OTHER SUPPORTING DOCUMENTS

- 17.1 [BC College and Institute Act](#)
- 17.2 [BC Freedom of Information and Protection of Privacy Act](#) (FOIPPA)

18.00 HISTORY

Created/Revised/ Reviewed	Approval Date	Author’s Role	Approved By
Created	2017		Board of Governors
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