

## Privacy of Information Policy

April 13, 2004

On January 1, 2004 Federal and Provincial legislation came into effect that governs how charitable institutions can use personal information. Northwest Baptist Seminary respects the privacy of personal information provided by employees, students, donors, alumni, customers and other stakeholders. We are committed to protecting the privacy of personal information entrusted to us. We seek to be transparent and accountable in the collection, use disclosure and security of private information.

Northwest Baptist Seminary collects personal information only to enable us to provide required services and to meet legal and regulatory requirements. Only relevant and necessary personal information will be collected. Purposes for which it may be requested would include educational services; developing, enhancing and administering relationships with alumni, volunteers, and donors; and managing, planning and developing our institutional operations.

Personal information provided to Northwest Baptist Seminary is protected in the following ways:

- Information about you and your communication with Northwest remains confidential.
- Northwest does not sell, rent, or loan any personal information about our students, donors, alumni, employees and other stakeholders to third parties.
- Personal information is gathered and disclosed only under the terms and conditions defined in our Privacy of Information Policy.
- Appropriate steps are taken to ensure that personal information in our possession is secure and accurate.
- Individuals may seek access to personal information held by NBS in accordance with the practices expressed in our Privacy of Information Policy.
- Appropriate security measures are in place to protect your personal information.
- Personal information from time to time is shared with third parties for use in employee management, student management, and denominational management. In such cases NBS has assurance from the third party that they adhere to the Privacy of Information regulations.

We collect and store some public and nonpublic personal information. It comes from a variety of sources, such as donations, student academic information, employee information and alumni contacts. We collect only the information we need for necessary institutional business. We keep personal information as long as necessary to serve our students, alumni, donors, employees and other stakeholders, and as required by law. When personal information records are destroyed, we use appropriate safeguards (i.e. shredding) to prevent unauthorized parties from gaining access to the information during the process.

Because we work in a Consortium and are affiliated with Trinity Western University student records are shared with employees who work within the Consortium and University, but are not employees of Northwest Baptist Seminary, on a need to know basis. For example, the Seminary Registrar of Northwest Baptist Seminary is an employee of Trinity Western University, but he acts as our Registrar because of the nature of the Consortium arrangements that we have and our affiliation with Trinity Western University. This also is the case with Seminary alumni personal information. Seminary graduates (since 1988) will realize that their degrees are awarded conjointly by Northwest Baptist Seminary and the University. They are alumni then both of Northwest and the University. From time to time it is also that case that some personal information of employees will be shared with other institutional members of the Consortium. For example, a faculty member applying for promotion within Northwest Baptist Seminary will realize that the personal dossier he or she creates for this purpose will be shared with faculty from other seminaries in the Consortium as part of our agreed process for evaluating such applications. We do not share information about donors in this way.

Personal information collected by Northwest, with the kinds of exceptions described in the previous paragraph related to our Consortium linkages, is kept in confidence. Northwest Baptist Seminary employees, Trinity Western University employees and employees in other Consortium partners are authorized to access the information solely on the basis of their need to deal with the information in order to discharge their official responsibilities. Safeguards are in place to prevent unauthorized access to personal information. Personal information is retained only as long as is necessary for the fulfillment of the purposes listed above.

If you wish to read Northwest Baptist Seminary's privacy policy, or if you have any questions, concerns or complaints regarding Northwest's privacy policy and practices, please contact the Privacy Officer at: [president@nbseminary.ca](mailto:president@nbseminary.ca). The Privacy Officer for Northwest is the President.

### ***Procedures for Inquiries and Complaints***

If you have a question about the usage of your Personal Information by Northwest Baptist Seminary, the following procedures should be followed:

You should contact the Privacy Officer. This can be done through email ([president@nbseminary.ca](mailto:president@nbseminary.ca)) or by phone (604-888-7592).

Your question or complaint should be worded as clearly and specifically as possible so that the Privacy Officer can respond quickly and effectively. Please make sure you provide information about how to contact you with the response.

A response may take a while to develop if the investigation becomes complex or involves third party use of the information. However, should the investigation be prolonged, the Privacy Officer will notify the individual and give reasons for the delay.

The Privacy Officer will provide a written response to the inquiry or complaint. Should corrective action be required, the Privacy Officer will indicate what that action is and its implementation.

If the individual is not satisfied with the response, then he or she may engage in further discussion with Privacy Officer and seek to obtain an appropriate response or he or she may appeal to the Northwest Baptist Seminary Board of Governors, asking them to review the complaint and determine an appropriate response to the issue.

The determination of the Board of Governors in the event of an appeal is final and the Privacy Officer shall comply with and implement any recommendation given by the Board.

If the individual is still not satisfied the unresolved challenge shall be recorded.

**Specific Protocols are available on request.**

### ***Northwest Baptist Seminary***

#### ***Personal Information Audit and Current Practices***

Northwest Baptist Seminary collects personal information from employees, students, alumni, donors and other stakeholders.

## **EMPLOYEE PERSONAL INFORMATION**

All employees are required to provide to NBS certain personal information for purposes of hiring, evaluation, and payroll.

This information is held in two places. Information related to hiring, evaluation and promotion is held in the employee's file in the President's office. The Dean may also have some personal information about faculty related to hiring, evaluation and promotion. The second place is in the bookkeeper's office for purposes of managing payroll.

With respect to payroll, we contract this service with a third party and for this reason must share necessary, but minimal personal information with this third party to support the payroll management process

Information is gathered through forms completed by the employee for payroll purposes, evaluation forms, and various data to support applications for promotion.

For the purposes of some benefits we also must provide personal information to third parties (e.g. Group Medical Benefits, National Office of the Fellowship of Evangelical Baptist Churches). NBS will only provide such information as it may be necessary to support payroll benefits agreed to by the employees as outlined in the Faculty and Staff Manuals.

In the case of faculty promotion and sabbatical applications, some personal data will be shared on a need to know basis with various committees in the Consortium as per our agreements.

The employee files related to payroll are kept secured by the bookkeeper in a locked file in her office. Computer records are password protected by the bookkeeper. . Only the bookkeeper, chief financial officer and the President have access to this information. The employee files related to hiring, evaluation and promotion are kept secured in a locked file in the President's office. Only the President has access to these files. From time to time some portions of this information may also be shared with the Dean for purposes of evaluation and promotion.

In the cases where personal information is shared with a third party a written assurance is secured that the third party has policies in place that are in compliance with the Privacy of Personal Information legislation.

Employees may request to review the information held in their personal files by applying in writing to the Privacy Officer, Larry Perkins. In the case that confidential evaluations have been provided to the institution about an employee, NBS reserves the right to summarize such responses but not to reveal the source of the response.

In the case the employee desires NBS to provide information to a third party, the employee must make the request in writing before any information is shared. This applies, for example, in the case of requests for references.

Personal information regarding payroll matters is retained as long as the person is an employee and for the legal period required after the person is no longer in the employ of NBS. Personal information for purposes of evaluation and promotion is retained as long as the person is an employee. When the person completes employment with NBS, this file is purged and only such information deemed pertinent for future use (i.e. copies of contracts, specific actions related to promotion or evaluation) will be retained and consolidated with the payroll information in one file. Such files are kept secured

by the bookkeeper. Equivalent information may also be archived in electronic files secured by the bookkeeper.

## **STUDENT & ALUMNI INFORMATION**

### **1. COLLECTION OF STUDENT & ALUMNI INFORMATION**

In order to fulfill its function as a post-secondary educational institution, Northwest is required to collect and maintain the personal and academic information of its students and alumni. This information is gathered during admission, registration and other fundamental activities related to being a student or alumnus/alumna of Northwest. When students apply for admission or supply their personal information, they have given written consent that Northwest may use information they have supplied for purposes consistent with the functions and activities of Northwest as an educational institution. The manner in which Northwest collects, uses, maintains, discloses and protects Student & Alumni Information is regulated by the Freedom of Information and Protection of Privacy Act. The following are our guidelines.

### **2. DEFINITION OF TERMS**

“**Student & Alumni Information**” refers to information related to a student’s or alumnus/alumna’s academic record at Northwest as well as to biographical and personal information, including digitized student identification photographs, whether in hard copy, electronic or some other form.

### **3. RESPONSIBILITY**

Primary responsibility for administering this policy rests with the Northwest Registrar (or his/her delegate).

### **4. SECURITY OF INFORMATION**

Northwest recognizes that personal information of students and alumni is their own “property” and requires protection from unauthorized use. Northwest Student & Alumni Information is maintained with utmost security. Electronic records are maintained in an encrypted database that is fully secured. Only the registrar (or his/her delegate) have access to the database. Hard copy (paper) records are maintained in fire-proof filing cabinets that are kept in a locked storage room. Only the registrar (or his/her delegate) have access to that storage room.

In this way all requests for access to Student & Alumni Information (electronic or hard copy) will be controlled by the registrar (or his/her delegate).

### **5. ACCESS TO STUDENT & ALUMNI INFORMATION**

Access is generally restricted to Northwest instructional or administrative staff with a legitimate need, such as for processing, information or analysis purposes, or for academic advisement purposes. Normally, instructors are limited to accessing grade reports when writing letters of reference.

Normally, students may access any information pertaining to them. However, such access will only be granted on the basis of a signed, written request. Restriction to [exclusion from] this access covers material submitted to Northwest in confidence (e.g., letters of reference).

If a student has outstanding debts to Northwest, access may be restricted and certain academic documents (e.g., transcripts, graduation diplomas) may be withheld.

### **6. POSTING OF STUDENT GRADES**

Provided the identity of individual students is protected, an instructor may convey information about student academic performance (e.g., grades on assignments, mid-term or final examinations) by posting results in a public place such as an office door, bulletin board or course website.

## **7. RELEASE OF STUDENT & ALUMNI INFORMATION TO MEMBERS OF THE PUBLIC**

**Responsibility for releasing** Student & Alumni Information (e.g., transcripts, grade reports, letters of standing) to members of the public is restricted to the Registrar (or his/her delegate).

**Definition:** In this policy, “members of the public” means any person or agency other than the student and those Northwest faculty and staff with a legitimate need to access Student & Alumni Information. A student’s parents, spouse, other relatives, employers, landlords, associations and members of other educational institutions or agencies are considered members of the public.

Northwest occasionally creates student address directories to facilitate communication among students. A student may direct the Registrar’s Office to suppress his or her name from such directories. All other Student & Alumni Information is considered private and confidential and normally will not be released to members of the public, except with the student’s prior written consent, or on the presentation of a court order, or otherwise under compulsion of law. Other information includes, but is not limited to, social insurance number, date of birth, marital status, details of individual courses (including courses in which the student is enrolled, and grades awarded).

Necessary personal information may be released without student consent in an emergency if the knowledge of that information is required to protect the health and safety of that student or other persons.

Requests for access to Student & Alumni Information for research or operational purposes will be adjudicated by the Registrar or Dean, as appropriate. Generally, statistical material drawn from Student & Alumni Information may be released without individual student consent when the following criteria are met:

the intended use of the data stated in the request is judged to be appropriate; the agency involved is judged to be an appropriate recipient of the data;

the identity of individual students cannot be determined in any data released; the research proposal has received the appropriate ethics review and approval; the Registrar or Dean has the right to review the results of any research or analysis based on the data provided and to comment on the use of the data prior to publication.

## **DONOR PERSONAL INFORMATION**

Donor privacy is a high priority at NBS as we have always maintained a policy of protecting our customers’ personal information.

1. Donor personal information is retained in order to process receipts, maintain a donation history and report this information to CRA and CCCC.
2. This information is held in two places:
  - a. “Donor Database” which is maintained by NBS staff. Steps are taken to ensure the protection of this electronic information
  - b. Photocopies of donations received and receipts issued. Copies of issued receipts are retained as required by CRA and CCCC.
3. An individual may contact NBS and be removed from any mailing lists at their request.

## **VOLUNTEER PERSONAL INFORMATION**

A volunteer with NBS includes (but is not limited to) our Board of Governors. Personal information would include: spouse’s name, home address, home phone #, work phone #, email address, occupation/employer and church attended.

This information can be used for the following kinds of purposes:

1. The board members name (and spouses name) are located on the NBS website, but no further personal information is located there.
2. A list of current board members and personal information is supplied to the CRA and CCCC each year.
3. Contact information is provided to our Fellowship to encourage good communication between the denomination and the Seminary. Board members may state which contact information they will allow to be released to the Fellowship.

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[1] CRA – Canada Revenue Agency; CCCC – Canadian Council of Christian Charities