

CAREY HALL PRIVACY POLICY

Introduction

Throughout this document, Carey Hall (or its shortened form: Carey) shall be deemed to reference: Carey Theological College, Carey Institute, and the Carey Centre.

Carey Hall respects the privacy of the personal information of its employees, students, residents, donors, alumni, and other stakeholders. Carey is committed to protecting the privacy of personal information entrusted to us. In line with that commitment, we seek to be transparent and accountable with respect to the collection, use, disclosure and security of personal information.

This policy sets out the principles that Carey Hall applies with respect to the collection, use, disclosure, and protection of personal information.

Scope

This policy applies to personal information of Carey's employees, students, residents, donors, alumni and other stakeholders such as applicants for admission as students and third-party educational partnerships or agencies contracted for purposes of promotion and advertising.

Accountability

Carey Hall is responsible for the protection of all personal information under its control. Senior management is responsible for ensuring compliance with Carey's privacy policy and may designate one or more employees to be accountable for compliance with the policy.

Carey has designated its Registrar as maintaining overall responsibility for the protection of personal information and compliance with this policy.

Carey shall implement policies and procedures to:

- Protect personal information;
- Receive and respond to complaints and inquiries;
- Train and communicate to staff regarding privacy policies and practices; and
- Communicate Carey's privacy policies and practices publicly.

Purposes For Collection

Carey shall identify the purposes for which personal information is being collected at or before the time of collection. Carey shall communicate either orally or in writing the purposes for which personal information is collected at the time of collection. Carey shall not use or disclose for any new purpose any personal information without first identifying and documenting the purpose and obtaining the written consent of the individual concerned. The main purposes for which Carey collects personal information are as follows:

Employees

Personal information of employees is collected to fulfill the following purposes:

- Maintain administrative and financial records in accordance with provincial and federal regulations
- Maintain personnel files in accordance with approved Carey policies
- Communicate, via email, telephone, or personal interview, details regarding special employee activities, events and planning
- Provide access to support services through other theological institutions, University of British Columbia, and CBWC denominational offices

Students

Personal information of students is collected to fulfill the following purposes:

- Compliance with legal and regulatory requirements
- To assess application for placement in Carey Hall residence;
- Determine eligibility for admission to Carey Theological College;
- Registration for Carey Institute events;
- Provide educational services;
- Process financial transactions and applications for financial aid;
- Facilitate students' membership with the Regent-Carey Library, Vancouver School of Theology Library and the University of British Columbia Library;
- Transfer information upon graduation to the Carey Alumni Association;
- Provide accurate information to a third party when the student has requested a reference; and
- Comply with legal and regulatory requirements.

Alumni

Personal information of alumni is collected to fulfill the following purposes:

- For communication: mailing/E-mail/Telephone/Face-to-Face contact for the objective of relating Carey's activities/events/news;
- Establish and maintain responsible relations with alumni and to provide ongoing service;
- Understand alumni needs and preferences;
- Develop, enhance, advise and provide products and services; and
- Comply with legal and regulatory requirements.

Donors

Personal information of donors is collected to fulfill the following purposes:

- For communication: Mailing/E-mail/Telephone/Face-to-Face contact for the objective of relating Carey's activities/events/news;
- For administration and maintenance of donation information and to ensure compliance with legal and regulatory requirements;
- Facilitation of fundraising activities to provide support for board approved programs and projects; and
- Comply with legal and regulatory requirements.

Consent

The knowledge and consent of individuals, expressed or implied, are required for the collection, use, and disclosure of personal information. Consent will not be obtained through fraudulent means or by deceptive methods, and clear communication will be employed to fairly and reasonably draw the individual's attention to the issue of consent.

Obtaining Consent

An individual's expressed consent is communicated to Carey either personally or through an authorized representative. As appropriate, individual expressed consent to the collection, use and disclosure of personal information in exclusive conditions will be sought. In other circumstances, Carey will seek implied consent from individuals in situations where it is more fitting to seek consent through "opt-out" opportunities presented through direct mail publications, telephone, e-

mail or other communication methods. Where such mechanisms are not employed by an individual, Carey shall be entitled to assume that the individual has consented.

Withdrawal of Consent

Any individual may withdraw his or her consent to the collection, use or disclosure at any time, subject to legal or contractual restrictions and reasonable notice. Carey shall comply with these requests and inform the individual of the implications and restrictions of such withdrawal of consent.

Consent Non-Requirement

As prescribed by legislation, staff may lawfully collect personal information without the knowledge or consent of the individual only under certain circumstances. Some examples are:

- Where collection of the personal information is clearly in the interest of the individual and consent cannot be obtained in a timely way;
- When collection and use of personal information is required in the case of an emergency that threatens the life, health or security of an individual;
- Where collection of the personal information with the knowledge or consent of the individual would compromise the availability of the accuracy of the information and the collection is reasonable for purposes of an investigation or a proceeding;
- When the information is already publicly available; and
- When the information is collected from another organization that collected it with the consent of the individual and the information is collected solely for the purposes for which it was previously collected and to assist that organization.

Limiting Collection

Collection of personal information shall be limited to that which is necessary for the purposes identified by Carey. The collection of personal information shall primarily be obtained from the individual concerned with their consent, either expressed or implied, through fair and lawful means.

Means of Collection

Personal information may be collected in many ways including, but not limited to:

- Personal communications between the individual and staff of Carey;
- Publicly available information;
- Responses to mailings or other advertising media;
- Communications from authorized representatives of individuals;
- Responses from Carey sponsored, or co-sponsored, events or activities.

Use, Disclosure and Retention

Carey shall not use or disclose personal information for purposes other than that for which the information was collected, except with the consent of the individual or as required or permitted by law. Personal information shall be retained only as long as is necessary for the fulfillment of those purposes. Personal information that is no longer required for its identified purposes or for legal or business requirements shall be destroyed or made anonymous. Personal information used to make a decision which affects an individual to whom the personal information relates shall be retained for no less than one year from the time of notifying the individual of the decision.

Carey shall not sell, rent or loan the personal information of its employees, students, residents, donors, and partnered relationships to third parties. Except as stated below, personal information is not disclosed to any third party even those whose purpose could be construed to be compatible with that of Carey Hall. In disclosing personal information to third

parties, Carey shall make every reasonable effort to ensure that the organizations to which the information is disclosed use that information only for the purposes for which it was disclosed.

Third Parties

The following personal information may be disclosed to a third party without consent:

- The credentials Carey Theological College or the Carey Institute has awarded to the student and the date those credentials were awarded;
- The names of recipients and the amounts of scholarships, bursaries or awards that have been conferred by Carey Theological College;
- The names and addresses of members of Carey's mailing lists to mail handling agencies.

As permitted by legislation, personal information may be disclosed without consent in certain circumstances. These include, but are not limited to, the following:

- Where the disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- Where the disclosure is necessary in order to collect a debt owed to the organization or for the organization to repay an individual money owed to them by the organization; and
- Where the disclosure is to a law-enforcement agency in Canada, concerning an offence under the laws of Canada or a province, to assist in an investigation.

In all other cases, personal information of an individual will not be disclosed to a third party unless consent has been obtained.

Alumni and Library Services

Certain personal information such as names, student identification numbers and contact information of all students may be disclosed to the following:

- Carey Theological College Alumni Association in order to provide membership services;
- Carey - Regent Library Services;
- Vancouver School of Theology Library Services; and
- University of British Columbia Library Services.

Employees of Carey Hall

Access to records is permitted only to Carey faculty and staff whose official responsibilities require such access. Furthermore, access is limited, as much as is feasible, to the extent that is consistent with those responsibilities.

Personal information about an individual will be disclosed to a member of Carey faculty and staff or to members of a College committee only where that information is judged to be consistent with the official duties of that faculty, staff or committee.

The office of the Registrar distributes to faculty, and to their teaching assistants, class lists and grade rosters which shall include contact information of students registered for classes.

In all cases, those who are permitted access to student records and those who receive personal information pertaining to specific individuals shall be advised of the privacy policy and shall be required to sign the Privacy Agreement.

Officials and Official Agencies

Personal information concerning individuals may be disclosed when it is legally required to do so (e.g., information required by subpoena or court order).

Carey provides personal information of students to Statistics Canada as required. Personal information of individuals is also provided to Canada Customs and Revenue Agency. Students and employees may appeal to Statistics Canada to have their personal information removed from its database.

Accuracy

Carey shall make reasonable efforts to ensure that all personal information collected is accurate and complete, and shall also make reasonable efforts to keep the personal information up-to-date. It is the responsibility of the individual to whom the information relates to notify Carey of any changes or corrections to that information. Inaccurate information shall be corrected upon request made by the individual to whom the information relates. Supporting legal documentary evidence may be requested to substantiate the request.

Safeguards

Carey shall ensure the security of all personal information that is retained. Security arrangements will be employed to protect personal information against loss or theft, as well as against unauthorized access, disclosure, copying, use, modification, or disposal. Personal information shall be protected regardless of the format in which it is held. The nature of the safeguards will vary depending on the sensitivity of the personal information that has been collected, the amounts, distribution, and format of the information, and the method of storage. More sensitive personal information will be safeguarded at a higher level of protection.

Methods of Protection

- Physical: fireproof, security lock filing cabinets, restricted access to offices, security systems with individual password protection.
- Organizational: disclosure of personal information within Carey shall be limited to those whose job responsibilities require access to such information.
- Technological: software security on LAN and individual computers is ensured through passwords and restrictive access.

Education

Faculty and staff are regularly advised of privacy issues and their role in ensuring the protection of personal information.

Third Party Disclosure

In the event that a third party becomes an agent of Carey for the purposes of using personal information in the implementation of College tasks and projects, Carey will require the third party to safeguard all personal information in a way that is consistent with Carey's policies and practices and that complies with the principles laid out in this Privacy policy.

Destruction of Personal Information

Carey shall ensure that care and attention is paid to the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.

Openness

Carey shall ensure that its policies and procedures that ensure the privacy of personal information are communicated in a fashion that allows for access to this information without unreasonable effort. This Policy will be made available in a form that is reasonable and understandable.

Carey shall make available:

- The address and contact information for Carey personnel responsible for the Privacy Policy;
- The means of gaining information to personal information held by Carey;
- A description of the type of personal information retained by Carey and its use;
- The complete Carey Hall Privacy Policy.

Communication tools that will be employed to highlight the above shall include, but is not limited to:

- Carey News publications;
- Carey Centre website;
- Office of the Director, Carey Institute and the Office of the Registrar

Individual Access

Upon request in writing, Carey shall inform an individual of the existence, use and disclosure of his or her personal information and the individual shall be given access to that information, except where the law requires or permits Carey to deny access. The individual must provide sufficient information to permit Carey, with a reasonable effort, to provide an account of the existence, use and disclosure of personal information. This information provided will only be used to respond to the request for access made by the individual. Carey shall comply with the request within thirty days upon receipt of a request.

Carey may lawfully deny access by an individual to his or her personal information where:

- The information is protected by solicitor/client privilege;
- Disclosure of personal information results in the disclosure of the personal information of another individual.

If Carey denies an individual's request for access to his or her personal information, the individual shall be notified of the reasons. The individual may then challenge this decision.

Compliance and Complaints

An individual shall be able to direct a challenge concerning compliance with any of the principles laid out in this privacy Policy to the Privacy Officer.

All complaints will be investigated. If the Privacy Officer determines a complaint is justified, Carey will take appropriate measures, including, if necessary, amending its policies and procedures. The complainant shall be notified of the outcome of the investigation regarding his or her complaint.

If the Privacy Officer is unable to address the complainant's concerns, the issue shall be referred to the Office of the President.

Contact Information

Privacy Officer
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5920 Iona Drive
Vancouver, BC V6T 1J6
Phone: 604-224-4308; Fax: 604-224-5014
Email: privacy@carey-edu.ca