



THE
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Student Privacy Policy of The Presbyterian College

*Adopted by Board of Governors
Last Update: Fall 2021*

The Presbyterian College is committed to the protection and upholding of the privacy rights of students, and in this respect the College is subject to the *Civil Code of Quebec*, S.Q. 1991, c. 64, and the *Act Respecting the Protection of Personal Information in the Private Sector*, S.Q. c. P-39.1, within the Province of Quebec.

The College has appointed a Privacy Officer who may be reached at;

Roland De Vries, Principal
Privacy Officer
The Presbyterian College of Montreal
3495 University Street
Montreal, QC
Canada
H3A 2A8
514 288-5256 ext. 209
rdevries@pcmtl.ca

The purpose of this policy is to outline the use and protection of private information within the life and operations of the College.

1. Scope and Definitions

- 1.1. This policy applies to all students enrolled in academic programs of The Presbyterian College or enrolled in combined academic programs of The Presbyterian College with McGill University, the Montreal School of Theology, the Institut de Théologie pour la Francophonie, or the Université Laval. A “student” is defined as any person so enrolled.
- 1.2. “The College” refers to The Presbyterian College.
- 1.3. “The administration of the College” refers to faculty and staff of the College who are responsible for the administration of the academic programs of the College, inclusive of procedures related to admissions, registration, ongoing enrollment, student records, bursaries and scholarships, student accounts, and other related matters.
- 1.4. “The Principal” refers to the Principal or Acting Principal or those whom she or he may designate to fulfill specific responsibilities that belong in a particular way to the office of the Principal, as determined by the Board of Governors.
- 1.5. “The faculty” refers to the Principal, **Professor of Pastoral Leadership**, Academic Dean, **Director of the MTS program**, and any other person whom

the Board of Governors of The Presbyterian College may name as such in due course and in fulfillment of its mandate.

- 1.6. “Student information” or “student data” refers to:
 - 1.6.1. Personal identifying data, including name, address, email address, telephone number, date of birth, social insurance number, and other related, specific information.
 - 1.6.2. Admissions data, including transcripts and related information from other academic institutions, letters of reference, personal statements, vocational and church background, and other related information.
 - 1.6.3. Program data, including degree program, course grades, narrative course evaluations, lay committee, supervisor and self evaluations, graduation information, and other related data. Also, data or documentation that is gathered under the Montreal School of Theology’s (MST’s) LEAP/Portfolio policy, for the purposes of evaluating the educational effectiveness of MST programs.
 - 1.6.4. Other personal information which a student may, at his or her own initiative, voluntarily disclose to a member of the faculty or to the administration of the College, in the course of his or her studies.

2. General

- 2.1. The College has a legal obligation to protect the privacy rights of all students and is subject to the *Act Respecting the Protection of Personal Information in the Private Sector*, S.Q. c. P-39.1, within the Province of Quebec.
- 2.2. Student information is gathered and held by the College for the purposes of (i) admission to and registration within academic programs, (ii) continuing enrollment and progress through academic programs, and (iii) maintaining appropriate or necessary records subsequent to a student’s graduation or withdrawal from academic programs.
- 2.3. Student information indicated in paragraph 1.6.4, above, will not constitute a part of the student’s academic record and will be used only for the purposes of personal, pastoral, or programmatic support of the student in the course of his or her academic program. Any record of such student information will be deleted at the request of the student or immediately following graduation or permanent withdrawal from his or her academic program.
- 2.4. Students of the College in the Master of Divinity program, who are also certified candidates for ministry of The Presbyterian Church in Canada, are subject to unique privacy policy terms in addition to, and in qualification of, the terms otherwise laid out in this document, the details of which are indicated below.

- 2.5. The Principal is accountable to the Board of Governors for implementing procedures by which accurate data, gathered from students, agencies, institutions, and faculty/instructors, is appropriately maintained or disseminated consistent with this policy.
- 2.6. Based on the Memorandum of Understanding established between the Montreal School of Theology and McGill University, the administration of the College is provided with access to student data from McGill University, as follows: degree program, course enrollment, course completion, grades, GPA and CGPA, withdrawals and other related information that is usually available on the transcript of any McGill student. This student data, held by The Presbyterian College, is subject to this privacy policy.
- 2.7. Based on the affiliation of The Presbyterian College with the Montreal School of Theology, and student enrollment in a combined program (Certificate in Theology or Master of Divinity), the following student data will be shared with the Academic Committee of the Montreal School of Theology: admissions information (including previous degrees and CGPA, previous professional or church experience, faith tradition, and other related relevant information), and course grades or narrative evaluations of the student's academic program at The Presbyterian College/Montreal School of Theology/McGill.
- 2.8. Based on the memorandum of agreement between The Presbyterian College and the Institut de Théologie pour la Francophonie (ITF), the administration of the College is provided with application information from ITF. This student data, held by The Presbyterian College, is subject to this privacy policy.
- 2.9. Based on the service agreement between The Presbyterian College and the Université Laval, the administration of the College is provided with information from the Université Laval, as follows: degree program, course enrollment, course completion, project director/co-director, and program progress. This student data, held by The Presbyterian College, is subject to this privacy policy.
- 2.10. Student information that is held or used by the College is updated, corrected, or amended as appropriate upon documented notification from the student or another appropriate source, including but not limited to instructors, faculty members, or administrative staff.
- 2.11. Student information is held in secure files, in hard copy, within a locked cabinet and within a locked or supervised office within The Presbyterian College.
- 2.12. All online or web accessible student information will reside on secure College-owned and operated servers or on approved, secure external third-party operated servers, and be readily accessible to the administration of the College for the administration of such information.
- 2.13. Any use by the College of an external, third-party company to house student information of students of The Presbyterian College will include a written agreement that indicates clear and sufficient practices related to security,

privacy, retention, deletion, and backup procedures, and any such written agreement will be signed by the Principal.

- 2.14. In the provision and administration of any online course, the College will ensure that online connection and course engagement is provided by way of secure login and passcode, and that student privacy, and the privacy of student information, is assured in that context.
- 2.15. Student information is maintained in current folders, in hard and/or digital versions for a minimum of two years following completion of the student's program, and is then permanently archived. Archived data includes only transcript data and narrative course evaluations, where relevant. This may include transcripts or academic information from other academic institutions that constitutes a part of the student's completion of his or her academic program at The Presbyterian College. Any student information that is maintained or archived under the LEAP/portfolio policy of the Montreal School of Theology will be treated in accordance with that policy, which is available on the website of the Montreal School of Theology.

3. Release of Student Information

- 3.1. Students will be provided with access to their own student file and student information upon written request for same addressed to the Privacy Officer at the above coordinates, and will have access to their file under the supervision of the Principal.
- 3.2. Students who are provided with access to their own student file and student information are not permitted to alter or remove any of the contents of the file.
- 3.3. No information will be released to external third parties without written student authorization. This includes requests from a spouse, parents, prospective employers, credit bureaus, finance companies, banks, private investigation companies or other similar persons or organizations.
- 3.4. Transcripts will be released to other institutions or bodies only upon receipt of a written request from the student.
- 3.5. Other student information may be released to another institution or body only upon written request and authorization from the student.
- 3.6. Staff and faculty may not access student information outside of the performance of their duties in relation to admissions, registration, student evaluation, the release of records, bursaries and scholarships, or other specific duties as may be required by their role and job description as part of the administration of the College.
- 3.7. In the event that a student record is subpoenaed by any Court, The Presbyterian College will undertake to entirely fulfill the requirement of the subpoena and

by way of a procedure that protects the privacy of the student as much as possible.

- 3.8. Limited student information (specifically, address, phone number, and email address) will be included in the student directory only with permission of the student.
- 3.9. Photographs of students involved in College-related activities will only be used for communication and publicity purposes (whether in hard copy or online) only with the permission of the student.

4. Master of Divinity students who are also certified candidates for ministry within The Presbyterian Church in Canada.

- 4.1. A student in the Master of Divinity program who is also a certified candidate for ministry within The Presbyterian Church in Canada is considered enrolled in the College in virtue of her or his status as a certified candidate; as one who is following the discernment process for ministry within The Presbyterian Church in Canada. The Presbyterian College is a part of The Presbyterian Church in Canada and in virtue of this identification contributes to the discernment process through the disclosure of relevant student information to the appropriate court of the church – namely, the certifying Presbytery.
- 4.2. The Principal of the College, or designated faculty member, will submit annual reports (or otherwise as it deems necessary) to the certifying Presbytery concerning the student's progress through the academic program, her or his general academic performance, and any matters pertinent to the student's fitness or competence for ministry, as such fitness or competence is understood within The Presbyterian Church in Canada.
- 4.3. The Principal or Director of Pastoral Studies may participate in discussions within meetings of the Presbytery of Montreal, or meetings of other Presbyteries when invited to do so, in which the discernment process of a particular student is under consideration. The Principal and Director of Pastoral Studies are not authorized to disclose to the Presbytery any student information other than that identified in the previous paragraph. Also, any disclosure of student information may be to those who are members of the certifying Presbytery, only, and not to any other person.
- 4.4. The College will receive, at the student's authorization, hard copies of both the Guidance Conference report and the Psychological Testing report of the student. These may not be copied or distributed in any way by the administration of the College. The faculty of the College may confidentially discuss these reports as part of the faculty's ongoing role in the discernment and certification process of the student. The Principal or Director of Pastoral Studies may also discuss these reports with relevant, authorized representatives of the certifying Presbytery (usually, the Ministry Committee).

- 4.5. The Guidance Conference and Psychological Testing reports are kept, in hard copy only, until the certified student is ordained, has graduated, or has permanently left the College. Following this, they are destroyed.
- 4.6. In the case of students who withdraw from the College and/or the discernment process of The Presbyterian Church in Canada, the Guidance Conference and Psychological Testing reports are kept on file, in hard copy only, for five years following such withdrawal.

5. Comments or Complaints

- 5.1. The College will take all reasonable efforts to respond to comments and information requests in a timely manner and in no event exceeding thirty (30) days. The College has put in place procedures to address and responds to complaints or requests concerning its privacy policies and practices. Requests and complaints concerning its privacy practices should be addressed to its Privacy Officer at the above coordinates.
- 5.2. The College investigates every complaint it receives according to its Student Complaint Policy a copy of which can be found at:
<http://www.presbyteriancollege.ca/about-us/policies/>
- 5.3. If the College deems a complaint to be justified, it will take the appropriate measures including amending its policies and practices.
- 5.4. Students also have the right to register a complaint with the Commission de l'accès à l'information du Québec at <http://www.caj.gouv.gc.ca/>.

6. Amendments

- 6.1. The College reserves the right to amend this policy at all times. The date on which the policy was last updated appears on the upper righthand corner of the policy. We will inform students of any important changes to this policy by publishing a notice on the home page of our site within a reasonable period time following the amendment.