

Policy on Privacy

Last updated: 21 February 2022

Related Policies:

Applies to: All faculty, staff, and students of MST and external members of the Academic Committee

Summary: Outlines the privacy rights of students in relation to MST

The Montreal School of Theology is committed to the protection and upholding of the privacy rights of students, and in this respect the School 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 School has appointed a Privacy Officer who may be reached at;

Roland De Vries, Director of MST
Privacy Officer
Montreal School of Theology
3495 University Street
Montreal, QC
Canada
H3A 2A8
514 288-5256 ext. 201
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 School.

1. Scope and Definitions

- 1.1. This policy applies to all students enrolled in academic programs of the Montreal School of Theology and its constituent colleges, including those enrolled in programs jointly offered with McGill University. A “student” is defined as any person so enrolled.
- 1.2. “The School” refers to the Montreal School of Theology
- 1.3. “The administration of the School” refers to staff of the School, its Director, and any others who on behalf of the School may have involvement with the administration of the academic programs of the School, inclusive of procedures related to admissions, registration, ongoing enrollment, student records, bursaries and scholarships, student accounts, and other related matters.
- 1.4. “The Director” refers to the Director of MST or those whom the Director may designate to fulfill specific responsibilities that belong in a particular way to the office of the Director, as determined by the Board of MST.
- 1.5. “The faculty” refers to any who teach in the academic programs of the School.
- 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 School, in the course of his or her studies.

2. General

- 2.1. The School 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 School 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 that person's 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. The Director is accountable to the Board for implementing procedures by which accurate data, gathered from students, agencies, institutions, and faculty/instructors, is appropriately maintained or disseminated consistent with this policy.
- 2.5. Based on the Memorandum of Understanding established between the Montreal School of Theology and McGill University, the administration of the School may be 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 School, is subject to this privacy policy.

- 2.6. Student information that is held or used by the School 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.
- 2.7. Student information is held in secure files, in hard copy, within a locked cabinet and within a locked or supervised office within the School.
- 2.8. All online or web accessible student information will reside on secure School-owned and operated servers or on approved, secure external third-party operated servers, and be readily accessible to the administration of the School for the administration of such information.
- 2.9. Any use by the School of an external, third-party company to house student information of students 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 Director.
- 2.10. In the provision and administration of any online course, the School 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.
- 2.11. 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 School. 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.
- 2.12. Members of the Academic Committee, as well as the Director of the School of Religious Studies, McGill University (or delegate) shall indicate in writing their awareness of, and requirement to uphold, the present policy.

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 Director.
- 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 School.
- 3.7. In the event that a student record is subpoenaed by any Court, the School 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 School-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. Comments or Complaints

- 4.1. The School 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 School 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 of MST.
- 4.2. The School investigates every complaint it receives according to its Student Complaint Policy a copy of which can be found at:
- 4.3. 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/>.

5. Amendments

- 5.1. The School reserves the right to amend this policy at all times. The date on which the policy was last updated appears on the head of this policy. The School 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.