

## PROCEDURES FOR ACCESS TO AND CORRECTION OF INFORMATION

**Procedural Authority:** University Secretary  
**Procedural Officer:** University Archivist

**Effective Date:** January, 2010  
**Supersedes:** New  
**Last Editorial Change:** July, 2012

**Parent Policy:** [Records Management Policy\(IM7700\)](#)

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### PURPOSE

- 1.00 The purpose of these procedures is to set out how the university will manage:
- freedom of information requests;
  - requests for correction of Personal Information in the university's custody or control;
  - requests to access Records in the university archives;
- in accordance with the *Freedom of Information and Protection of Privacy Act* (FIPPA), and where appropriate, the *Personal Information Protection Act* .

### DEFINITIONS

- 2.00 The definitions contained within the university's [Records Management \(IM7700\)](#) and [Protection of Privacy \(GV0235\)](#) policies apply to these procedures.

### PROCEDURES

#### RESPONDING TO REQUESTS FOR INFORMATION

##### Informal or Potential Freedom of Information Access Requests

- 3.00 When an individual contacts a Unit seeking Access to his or her Personal Information or access to a Record in the custody or under the control of the university, the Unit's Administrative Authority (or designate) will assess whether the individual is seeking Access to:
- (a) his or her Personal Information (e.g., the individual's file or a specific Record pertaining to that individual) only; or
  - (b) a university Record on a particular subject.
- 3.01 If the individual is seeking access to his or her Personal Information, after confirming the individual's identity, the Unit may disclose the information to the individual if that information can be disclosed routinely. This is considered an informal Access request.
- 3.02 If the Record(s) that the individual is seeking contains information about other individuals or was created with an expectation of confidentiality, the Unit will ask

the individual to make a formal freedom of information request (FOI Access Request).

3.03 If the individual is seeking Access to university Records on a particular subject, the Unit may disclose the information to the individual if that information can be disclosed routinely. This is considered an informal Access request.

(a) If the Records contain information that the Unit believes is confidential (such that the information may be subject to exceptions in *FIPPA*), the Unit will ask the individual to make an FOI Access Request.

4.00 Informal access requests will be processed as quickly as possible.

#### Receiving a Freedom of Information Access Request

5.00 In accordance with *FIPPA*, FOI Access Requests must be made in writing. Units shall ask the individual to make a formal written request in one of the following ways:

(a) by completing and submitting the FOI Access Request form available on the University Secretary's website or in person at the University Secretary's Office; or

(b) by writing a letter that specifies the information the individual is seeking and providing a contact address.

6.00 FOI Access Requests for general university information may be made by e-mail to the University Secretary's Office. However, requests for Personal Information must be made with the FOI Access Request form (signature required) or by submitting a signed letter. The University Secretary's Office will require confirmation of an applicant's identity prior to the release of any Personal Information in response to an FOI Access Request.

7.00 If a Unit receives an FOI Access Request, the Unit will forward it to the University Secretary's Office.

8.00 Records or information responsive to a request must not be destroyed after a request has been received.

9.00 Employees must treat, in a confidential manner, individuals' requests for Access to their own information and all FOI Access requests. Information about access requests is to be used only to the extent necessary to respond to a request. Applicants shall not be asked the reason(s) for which they have requested the information or Record(s). If in doubt, contact the University Secretary's Office.

#### Processing a Freedom of Information Access Request – Unit Responsibilities

10.00 Upon receiving an FOI Access Request, the University Secretary's Office will ask the Unit(s) to provide Records responsive to that request. Units are then responsible for:

(a) Making one single-sided copy of the requested Records (if any information has to be severed from Records, this must be from single-sided pages)

(b) Printing a single-sided copy of any electronic Records, including e-mails

- (c) Ensuring that Records are maintained in file order
  - (d) Making arrangements with the University Secretary's Office for in-person pick up or delivery of materials while ensuring that security and confidentiality are maintained; and
  - (e) Advising the University Secretary's Office of any other Unit(s) that may hold responsive Records.
- 11.00 If necessary, the Unit producing the Records will be contacted to answer any follow-up questions. The University Secretary's Office will handle all further correspondence with the applicant.
- 12.00 FOI Access Requests must normally be processed within thirty (30) working days of their receipt, unless otherwise authorized by *FIPPA* and as determined by the University Secretary.
- 13.00 The university may consult with third parties in limited circumstances, in accordance with *FIPPA*, if Records contain information about such parties. The University Secretary's office will manage consultations with third parties subject to an FOI Access Request.
- 14.00 The university may charge fees for FOI Access Requests made for general information in accordance with *FIPPA*. No fees can be charged for FOI Access Requests for an individual's own information. In some cases, a Unit may be asked by the University Secretary's Office to estimate the number of hours (less an initial three hours) required to locate, retrieve and produce the Records, and provide an estimate of the number of responsive pages. The University Secretary's Office will inform the applicant of the fee estimate where applicable.

### **CORRECTION OF PERSONAL INFORMATION**

- 15.00 An individual who believes there is an error or omission in his or her factual Personal Information in the custody or under the control of the university may request that the university correct that information.
- 16.00 When an individual contacts a Unit to request a correction to his or her personal information, Unit staff, as authorized by the Unit's Administrative Authority will assess if the individual is able to make the change through the university's online self-service portal. Personal Information that may be changed through the self-service portal includes: updates to phone numbers and addresses, additional e-mail addresses, and updates to emergency contact information.
- (a) If the information cannot be changed by the individual through the online self-service portal, the Unit will inform the individual of the steps required to correct the factual personal information, including the provision of appropriate documentation.

- 17.00 If the steps set out in section 16.00 do not resolve the matter, the Unit will ask the individual to make his or her correction request by one of the following means:
- (a) by completing and submitting the correction request form available on the University Secretary's website or in person at the University Secretary's office;
  - (b) by writing a letter that specifies the correction they are seeking, the location of the information (Unit responsible), a description of the information, the reasons for the correction and the individual's contact address; or
  - (c) by procedures established by the Registrar.
- 18.00 The university will process the request and determine if the correction will be made, and the University Secretary's Office or the Office of the Registrar will notify the individual in writing.
- 19.00 If the request is approved, the appropriate Unit will replace the information with the correct information in a timely manner.
- 20.00 If the request is denied, the appropriate Unit will annotate the information with the correction requested, in accordance with *FIPPA*.
- 21.00 Evaluative comments or assessments and opinions about individuals may, on request, be annotated but not corrected. Concerns regarding such information may be pursued through academic or Human Resources' channels.
- 22.00 If the University Secretary determines that a correction will be made to an individual's information, any other public body or any third-party to whom that information has been disclosed during the one year period before the correction was requested will be notified of the correction.

### **ACCESS TO RECORDS IN THE UNIVERSITY ARCHIVES**

- 23.00 In accordance with *FIPPA*, the university archives may disclose Personal Information in university Records for archival or historical purposes.
- 23.01 Archival descriptions of university Records, also known as finding aids, will specify whether Records must be reviewed for any exceptions to disclosure under *FIPPA* prior to use of the Records.
- 24.00 The *Personal Information Protection Act (PIPA)* applies to records donated to the university archives by individuals and organizations and permits disclosure for archival or historical purposes.

The Associate Archivist or University Archivist will review records for Personal Information prior to Access by a person and apply *PIPA* including, if necessary, a research agreement regarding disclosure.

### Archives Access Procedures

- 25.00 To access records in the university archives, an individual may contact the archives and identify the accession number and file titles of the Records that are required (located in the finding aid).
- 26.00 The University Archivist or Associate Archivist will review the file.
- (a) If Records containing information that may be subject to exceptions from disclosure can reasonably be removed from the file, the remainder of the file will be provided to the individual requesting access, as mutually agreed.
  - (b) If an individual requests Access to information that may be subject to exceptions from disclosure, the University Archivist or Associate Archivist will ask the individual to make a FOI Access Request.
  - (c) If an individual requests Access to a large body of Personal Information that may be subject to exceptions from disclosure, the University Archivist or Associate Archivist will discuss the use of a research agreement with the individual.

### **Research Agreements**

- 27.00 Some university Records have Access restrictions. In accordance with *FIPPA*, the university may allow access to Records containing Personal Information for statistical and research use through the signing of a research agreement between the university and an applicant governing the conditions of Access and use.

### **RELEVANT LEGISLATION**

*Freedom of Information and Protection of Privacy Act*  
*Personal Information Protection Act*

### **RELATED POLICIES AND DOCUMENTS**

#### [Protection of Privacy Policy \(GV0235\)](#)

- Procedures for the Management of Personal Information

#### [Records Management Policy \(IM7700\)](#)

- Procedures for the Management of University Records

#### [Information Security Policy \(IM7800\)](#)

- University Information Security Classification Procedures