

Conception Seminary College Policy Collection, Use, and Retention of Student Records

1. Conception Seminary College will collect, maintain, and retain information about students which have a declared, clear and justifiable purpose in education, formation, and the making of appropriate recommendations.
2. This information falls into two categories:
 - a. mandatory information (that which is essential to the proper aims and functioning of the institution);
 - b. voluntary information (that which is desirable but not essential to the proper aims and functioning of the institution or which the student provides on his own initiative);
3. Authorization for the collection of mandatory information must be approved by the Board of Deans.
4. Collection of voluntary information must have the informed and freely given consent of the student.
5. Information as to the intended uses, conditions of student access, access of other parties, and rules of retention must be in conformity with provisions of civil and ecclesiastical law and must be available upon request at the time of collection.
6. Information as to the accumulation of data about a student from sources other than the student himself, about the potential sources of such information, its uses, conditions of access, and rules of retention shall likewise be available to all students upon request.
7. A student record identifying him by name may not be used for purposes other than those publicly established by the institution at the time of their collection, unless the student has given his written consent.
8. Private notes which individual faculty or staff members may keep regarding their students are not regarded as official school records and will not be treated as such. The responsibility for insuring the privacy of such notes and destroying them as soon as they are no longer needed rests with the individual faculty or staff member.
9. Official student records shall be compartmentalized and stored, as much as possible, by determined categories of source, use and sensitivity. Fireproof file cabinets and locks shall be employed wherever appropriate to secure the contents from physical harm and undue access. Microfilm storage in a separate location is the preferred method of preserving a second set of those documents which have long-term or permanent value.
10. Computerized storage of student records shall be carefully planned in such a way that only selected categories of information are accessible to those responsible for specific duties deemed appropriate for the task specified in his/her position description or contract agreement. Special precautions should be taken lest zones of confidential information inadvertently be made available to unauthorized personnel.
11. Machine copying of records and/or the distribution of copies to authorized individuals must never be done without deliberate advertence to regulations of security and access and without safeguards against the increased chances of their violation.

12. Student records shall be retained only as long as there is a demonstrable reason to keep them for the sake of either the student, the institution, or some other person or outside body. Information that is deemed outdated, unverified, or otherwise unnecessary shall periodically be eliminated and destroyed. Specifically:
- a. At the end of each school year, all memoranda and unevaluated reports of college personnel, all unverified data and miscellaneous loose information shall be reviewed by the departments maintaining them and a decision made either to destroy a given item or to retain it for another year. Upon graduation or withdrawal, all such information shall be destroyed, unless it meets two conditions: (1) its accuracy must be clearly verified; and (2) its continued usefulness must be demonstrated.
 - b. Verified information of clear importance for the student's continuous enrollment through a full course of study and formation (e.g., background data, financial information, health record, academic and disciplinary record) shall be reviewed upon graduation or withdrawal and a judgement made as to its disposal or preservation.
 - c. All records which survive these interim and final reviews shall be retained for a specified period of time (destroyed 10 years from withdrew date) or retained in perpetuity (more than fifty years), with due regard for the rights of individuals, the needs of the institutional archivist, and the interest of historians in the future.
13. Pursuant to the above rules and principles governing access, all departments and offices maintaining student files, in cooperation with the Office of the Registrar, where most student records are eventually consolidated for central custody, shall establish systematic rules and procedures by which they propose to implement institutional policies in the management of student records.

Specifically, these rules and procedures are to include, for each document or significant cluster of information:

- a. description by name;
- b. description of the need to collect it, and whether it is mandatory or voluntary;
- c. level of sensitivity and any noteworthy precautions to be taken in use or maintenance;
- d. specific rules of access: by whom and in virtue of what principle or authorization;
- e. schedule of review;
- f. length of retention.

These rules and procedures shall be made known routinely in writing on an institution-wide format to those who must observe them on a day-to-day basis and to students upon request.

14. Adjudicating cases of dispute and imposition of sanctions belongs to the authority of the President-Rector, in consultation with the Board of Deans. To facilitate this occasional duty, he shall in each instance designate an impartial individual, who shall independently ascertain the facts of disputes or alleged violations. The Registrar shall serve generally as a primary channel of communication within the institution for all problems concerning student records.