1. Purpose

1.1 To ensure compliance with the privacy rules in B.C.’s Freedom of Information and Protection of Privacy Act.

1.2 To ensure that personal information in the form of grade lists and graded exams or assignments is disclosed in a manner that protects the privacy of the student.

2. Scope

2.1 Applies to all departments that post grades or administer student exams or assignments.

2.1.1 Posting student grades

2.1.1.1 The practice of posting student grades in identifiable form, by name or by student identification number sorted in alphabetical order, is an unreasonable invasion of privacy and contravenes the Freedom of Information and Protection of Privacy Act. Student names, identification numbers and grades fall under the definition of personal information in the Act.

2.1.1.2 Grades lists cannot be posted less the University can give a reasonable assurance of anonymity.

2.1.1.3 A number of mechanisms can be used to anonymize grades so that only the student themselves can identify their own grades. For example, when posting or circulating grades, the student’s name would be stripped from the list and the marks given in non-identifiable form sorted in numeric sequence by student number. In some cases, student privacy can only be assured by also deleting the first two digits (the entry year) and sorting the student id using the remaining identification numbers. An explanation of what has been done would accompany the posting.

2.1.1.4 If a class is small that students could easily be identified in spite of a process to conceal the identities, then grades would not be posted.

2.1.1.5 An exception to this practice is possible only if each student gives his / her prior written consent to disclose their grades in identifiable form. A method of collecting and administering this consent would also be needed.
2.1.2 Returning student exams or assignments

2.1.2.1 Student examinations and assignments fall under the definition of personal information in the Freedom of Information and Protection of Privacy Act. These documents may include the student's name, identification number, their personal views and opinions, comments and opinions evaluating their work and their grade.

2.1.2.2 The University is required by law to use reasonable security measures to protect the personal information in its custody or control. Physical and procedural security arrangements help reduce the risk that personal information is not disclosed, used, handled or destroyed in unauthorized ways.

2.1.2.3 Unauthorized access is when University employees or members of the public have access to personal information where they do not need to see or handle it. As public employees we are responsible to provide appropriate protection of the personal information entrusted to our care. We are accountable for inappropriate access, use and disclosure.

2.1.2.4 Reasonable security arrangements means taking measures that are appropriate to the type, sensitivity and volume of the information and the medium on which it is recorded, stored, transmitted, handled or transferred.

2.1.2.5 Examinations and assignments contain sensitive personal information. These records should only be returned to the student who wrote the exam or assignment and not to other individuals, unless the student has given his / her prior written consent. Students should not be allowed to handle exams or assignments other than their own if the record reveals personal information. Exams and assignments should not be left unsupervised in a public place for pick-up but should be kept, handled and returned in a secure manner.

2.1.2.6 To distribute students’ graded examinations and other assignments in identifiable form in a way that openly discloses personal information is possible only if each student gives her/his prior written consent. A method of collecting and administering this consent would also be needed.

2.1.2.7 One way to return exams and assignments is to record grades and comments on the inside cover and hand them back in the class/tutorial with supervision. Other ways to protect student privacy can be used.

2.1.2.8 The specific confidentiality measures used are at the discretion of each instructor to permit flexible, pragmatic procedures that suit the circumstances of each case. The standard is that the procedure used by an instructor must provide a reasonable assurance of privacy protection.

3. Authority

3.1 This procedure is administered under the authority of the Archives and Records Management Department. Questions about interpretation of the procedure may be directed to the University Archivist. See SFU Archives’ website (http://www.sfu.ca/archives) for contact details.