

 CAPILANO UNIVERSITY		PROCEDURE	
Procedure No.		Officer Responsible	
B.700.2		Vice President, Finance and Administration	
Procedure Name			
Right to Request Correction Procedure			
Policy This Procedure is Under			Date of Next Policy Review
B.700 Privacy and Access to Information Policy			2025
Date Issued	Date Revised	Responsible Director	
February, 2023		Designated Privacy Officer	

1 PURPOSE

- 1.1 Capilano University (the University) has a duty under the *Freedom of Information and Protection of Privacy Act* (FIPPA) to ensure that the personal information in its custody or under its control is accurate and complete.

2 OVERVIEW

- 2.1 FIPPA requires the University to protect all personal information in its custody and/or control from unauthorized access, collection, use, duplication, modification, disclosure, or disposal. Under Section 29 of FIPPA an individual whose information is in a public body's custody and/or control who believes there is an error or omission in their personal information can make a request to the Head (or designate) of the public body to correct the information.
- 2.2 The University will make available information about how to request corrections to personal information including guidance on which department(s) to contact (for example the Registrar for requests to change student information or HR for requests to change employee information).
- 2.3 Upon request by an individual to whom the personal information relates, the University will correct, make additions to, or annotate the information in accordance with FIPPA. Individuals may be required to provide documentary evidence, satisfactory to the University, to substantiate the request for correction.
- 2.4 The University has complex information systems, cooperation and follow up by the requestor may be required in order to fully address correction requests where personal information is stored in a number of systems or locations..

3 DEFINITIONS

Personal information means recorded information about an identifiable individual other than contact information.

Contact Information means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.

4 PROCEDURES

- 4.1 Guidance on the correction process will be provided, including information to alert individuals who may have personal information held in more than one system or location (for example students who also have been employed by the University or Employees who have taken courses) that they may need to send correction requests to more than one department administrators.
- 4.2 The factors to be considered in a correction request include:
 - a. the information must be Personal Information relating to the individual making the request
 - b. the information to be corrected must be inaccurate, incomplete, or ambiguous
 - c. the information is not opinion material provided by another individual
 - d. the information to be corrected must be in the custody or control of the University
- 4.3 All requests to correct Personal Information must be made in writing except as provided in the Freedom of Information and Protection of Privacy Regulation: specifically, unless the applicant has limited ability to read or write in English or a physical disability that impairs their ability to make a written request. In such circumstances they should be supported in making an oral request which will then be recorded and the accuracy of the request confirmed with the individual.
- 4.4 The University may request that documentary evidence is provided to support the request for correction.
- 4.5 After establishing that corrections need to be made the University will correct factual errors, add information so that the record is complete or, if the University declines to correct the record, annotate records in accordance with FIPPA.
- 4.6 If the requested correction relates to an opinion expressed or facts presented by another person about the individual requesting the correction the following approaches can be used:
 - a. a statement to the effect that the individual does not agree with the opinion or information given can be added to the record;
 - b. an annotated copy of the disputed record can be supplied by the individual making the request for correction and attached to the record; or
 - c. if the opinion was based on inaccurate or incorrect information, the person who supplied the original opinion could provide an amended document to be attached to the record.
- 4.7 Explanatory notes, such as letters, reports, written statements or other documents should be added to the record for future reference.

- 4.8 University may review any decisions that directly affected the individual where the incorrect or incomplete information could have influenced the outcome of that decision.
- 4.9 If the University has disclosed incorrect or incomplete information to another public body or third party by the University, notice of the correction or annotation will be provided.
- 4.10 Subject to limitations required or permitted by law, the University will inform the individual, in writing, that:
- a. the information has been corrected;
 - b. the information has been added;
 - c. the information has been annotated;
 - d. why a correction is inappropriate or why the proof provided is insufficient or inadequate in order to make the correction requested; and
 - e. any further steps to be taken by the University or the individual (if relevant).
- 4.11 Where a notice of correction is provided to the University from another public body or third party about Personal Information in a record sent to the University by that body/party correction or annotation should be made to the record held by the University.
- 4.12 If the University determines that no correction will be made the request and the decision should be documented and added to the record.

5 ADMINISTRATIVE RESPONSIBILITY FOR THESE PROCEDURES

- 5.1 The Vice-President Finance and Administration or the designated Privacy Officer is responsible for managing and administering these procedures.