

Real Estate Training Program Directive

Data Retention

Classification	Real Estate Training Programs
Responsible Authority	Program Manager, Real Estate Training
Executive Sponsor	Senior Vice President, Academic
Approval Authority	Executive Director, Online and Professional Training
Date First Approved	2025-05-30
Date Last Reviewed	N/A
Date to Complete Mandatory Review	2026-05-29

Purpose

To clarify Algonquin College’s data retention practices for the Real Estate Training Programs delivered under the authority of the Real Estate Council of Ontario (RECO). This directive supplements corporate-level College policies by addressing RECO-specific retention, storage, and protection requirements for learner and program administration records.

Scope

This directive applies to all learners and program administration records associated with the Real Estate Training Programs. It includes data generated through registration, instruction, facilitation, assessment, and administrative oversight.

Definitions

Learner Records	Data tied to prospective or current learners, including registration information, attendance, misconduct records, and program completion status.
Learning Management System	Hosts materials associated with courses and programs of study, fosters a community of learning through two-way communication and activity and engagement tools, provides a platform to collect and grade assessments, and simplifies monitoring student progression.

Program Administration Records	Records related to the delivery, staffing, oversight, and continuous improvement of the Real Estate Training Program.
Retention Period	The duration for which records must be maintained before eligible disposal.
Student Information System	A management information system for education establishments to manage student data. This includes capabilities for maintaining student demographic and registration information, registering students in courses, documenting exam results, tracking student attendance, tracking program progression, and managing other student-related data needs. The Student Information System used for RECO is Salesforce.
Secure Storage	Physical or digital storage that protects records from unauthorized access, loss, or destruction.

Policy

1.0 Governing Framework

This directive operates within the framework of the following Algonquin College corporate policies: [AA49 – Electronic Student Record Retention](#), [AA42 – Learning Management System](#), and [AA35 – Confidentiality of Student Records](#). These institutional policies take precedence in all matters relating to data retention, protection, and privacy. This directive addresses RECO-specific requirements not already detailed in the above policies.

2.0 Retention Periods

All learner and program administration records related to real estate education programs will be retained for at least 25 years, or 6 years following the termination of Algonquin College's authority to deliver the program, whichever is longer. This supplements the default timelines in AA49, which already retains key learner information such as demographic data, academic achievement records, and misconduct outcomes indefinitely.

3.0 Data Categories

Learner records are in two categories: demographic information tied to registration information such as name and address; and records relating to the participation of learners in the program including attendance and participation data, academic progress and program completion documentation, and records of misconduct investigations and outcomes.

Program administration records include documentation related the delivery of the program. This includes data related to program administration and maintenance of curriculum, logs of facilitator and staff

involvement, and planning and compliance materials necessary to demonstrate program currency and oversight.

4.0 Storage Location

All Real Estate Training program-related records must be stored securely within Canada or the United States. This requirement is consistent with applicable privacy legislation and College practices. Where third-party platforms or cloud services are used, including the Student Information System and the Learning Management System, they must comply with this geographic limitation and be approved by Algonquin College IT Services.

5.0 Data Protection and Access

The protection, access, and sharing of learner and program records must comply with AA35 – Confidentiality of Student Records and AD02 – Freedom of Information and Protection of Privacy. Records will be accessible only to authorized personnel and managed in accordance with College data governance protocols.

6.0 Disposal

Upon the expiration of the applicable retention period, records will be securely disposed of using College-approved methods to ensure they cannot be reconstructed or accessed by unauthorized individuals.

Procedure

	Action	Responsibility
01	Identify all learner records and program administration records relevant to RECO program delivery.	Program Manager
02	Ensure records are stored securely within Canada or the United States, using College-approved systems.	ITS and Registrar's Office
03	Retain records in accordance with this directive and Algonquin College policies.	Registrar's Office and Program Staff
04	Implement safeguards to protect all records, especially those containing personal information.	ITS and Program Manager
05	Dispose of records securely at the end of the retention period.	Registrar's Office

Related Policies and Directives

AA49 – Electronic Student Record Retention

<https://www.algonquincollege.com/policies/files/2024/03/AA49.pdf>

AA42 – Learning Management System

<https://www.algonquincollege.com/policies/files/2022/06/AA42.pdf>

AA35 – Confidentiality of Student Records

<https://www.algonquincollege.com/policies/files/2024/07/AA35.pdf>

AD02 – Freedom of Information

<https://www.algonquincollege.com/policies/files/2024/08/AD02.pdf>

IT01 – Information Security Policy

<https://www.algonquincollege.com/policies/files/2021/01/IT01.pdf>