



Title	Number
Copyright Oversight and Risk Mitigation	G-6510-LP
Approval Authority (Operational Administrator)	Approval Date
Director, Learning Commons & Academic Success Centre	February 3, 2026
Department or School	
Learning Commons & Academic Success Centre	

PURPOSE

This Local Practice describes how the College manages internal copyright oversight and risk mitigation activities in support of institutional compliance and continuous improvement. It supports the *Submitting and Sharing Course Readings Procedure* and the *Copyright Policy* by documenting internal processes used by designated academic and administrative units when potential copyright risks are identified.

This Local Practice does not replace or limit existing roles, authorities, or decision-making responsibilities elsewhere in the College.

STATUS & USE

This document is an internal Local Practice used by designated academic and administrative leaders to support oversight, trend awareness, and institutional risk mitigation.

The existence of this process is reflected in the *Submitting and Sharing Course Readings Procedure*, which outlines faculty-facing expectations and communication when potential copyright concerns arise.

This Local Practice is operational in nature and may be updated as practices, capacity, or risk posture evolve.

GUIDING PRINCIPLES

- Copyright oversight activities under this Local Practice are guided by the following principles:
 - Good-faith support:** Activities focus on education, guidance, and problem-solving rather than monitoring, enforcement, or evaluation.
 - Proportionality:** Actions taken are proportionate to the nature and level of identified risk.

- 1.3 **Respect for academic freedom and delegated authority:** Oversight activities do not involve review or approval of instructional content or teaching practice and do not interfere with the roles or authority of Deans, Associate Deans, or other academic leaders.
- 1.4 **Privacy protection:** Information is handled in accordance with applicable privacy requirements and institutional protocols.

OVERSIGHT AND SAMPLING APPROACH

1. The College may use limited sampling activities to identify general trends and institutional copyright risks related to the sharing of course readings.
2. Sampling:
 - 2.1 is aggregated and de-identified,
 - 2.2 is not used to evaluate individual faculty,
 - 2.3 supports institutional learning and resource development, and
 - 2.4 does not involve routine review or approval of course materials.
3. Sampling does not imply non-compliance or wrongdoing and is used solely to inform support and risk-mitigation efforts.
4. Oversight and sampling activities under this Local Practice are limited to College-supported systems identified in applicable standards and procedures.

IDENTIFICATION OF POTENTIAL CONCERNS

1. Potential copyright concerns may be identified through:
 - 1.1 sampling activities,
 - 1.2 user inquiries or requests for support,
 - 1.3 or other internal review mechanisms aligned with institutional responsibilities.
2. Identification of a potential concern does not imply fault, misconduct, or non-compliance.

REVIEW & MITIGATION

1. Where a potential copyright concern is identified, the College may take proportionate steps to reduce institutional risk while supporting good-faith decision-making.
2. Such steps may include actions such as:
 - 2.1 consulting with the faculty member involved to clarify context,
 - 2.2 providing guidance, tools, or alternative options,
 - 2.3 and, where necessary, temporarily limiting access to materials while the issue is under review.
3. Actions focus on education and problem-solving. More serious or repeated issues may be addressed through existing College processes, consistent with the Collective Agreement and applicable policies.

INTERNAL INFORMATION SHARING

1. Aggregated summaries of oversight activities may be shared with relevant academic and administrative leadership, for example Deans, Associate Deans, and the Vice President Academic, to support oversight, trend awareness, and continuous improvement.
2. Any engagement with the Faculty Association, where appropriate, occurs through existing labour-relations processes rather than routine operational reporting.

DOCUMENTATION & RECORD KEEPING

1. To support continuity, accountability, and institutional learning, limited internal records may be maintained in relation to oversight and risk-mitigation activities carried out under this Local Practice.
2. Short-term working records may be used to document the identification, review, and resolution of specific copyright concerns. These records support coordination and follow-up and are retained only as long as required to address the matter, after which they are deleted or anonymized.
3. Aggregated and de-identified records may be maintained to support institutional trend analysis, guidance development, and continuous improvement.
4. Record-keeping under this Local Practice is limited to what is necessary for these purposes and does not involve monitoring, evaluation, or tracking of individual faculty activity.
5. All records are managed and disposed of in accordance with applicable privacy legislation and the College's records-management practices.

ROLES & RESPONSIBILITIES

1. **Director, Learning Commons & Academic Success Centre**
 - 1.1 The Director is responsible for overseeing the implementation of this Local Practice. This includes coordinating internal oversight and sampling activities, ensuring appropriate documentation and information handling, supporting proportionate risk-mitigation actions, and maintaining alignment with the Copyright Policy and associated procedures.
 - 1.2 This role does not supersede or limit the authority of Deans, Associate Deans, or other academic leaders.
2. **Learning Commons**
 - 2.1 In their institutional role, librarians may:
 - a) support sampling and trend identification activities,
 - b) provide copyright guidance, educational resources, and consultative support,
 - c) and contribute to institutional learning, guidance, and continuous improvement.These activities are supportive and educational in nature and do not involve monitoring, evaluation, or approval of individual faculty course materials.

3. **Centre for Teaching & Learning (CTL)**

3.1 CTL supports this Local Practice by:

- a) helping to provide educational guidance and professional development related to copyright literacy and responsible use of course materials;
- b) collaborating on mitigation strategies when potential concerns arise; and
- c) supporting alignment between this Local Practice and faculty-facing procedures and guidance.

3.2 CTL does not approve instructional content or teaching practice.

4. **Academic and Administrative Leadership**

4.1 Designated academic and administrative leaders may receive aggregated information to support institutional oversight and decision-making within their existing roles and authorities.

4.2 Nothing in this Local Practice limits, redirects, or replaces the responsibilities or discretion of Deans, Associate Deans, or other leaders.

REVIEW AND MAINTENANCE

This Local Practice may be reviewed and updated as needed to reflect changes in legislation, institutional risk posture, or operational practices.

Updates to this Local Practice do not require Executive approval and do not alter the authority of related policies, procedures, or standards.

Definitions and Acronyms	
Aggregated and De-Identified Information	Information that has been combined and processed so that individual faculty members, courses, or students cannot be identified.
College-Supported Systems	Digital systems and platforms approved by the College for the distribution of course readings, as identified in applicable standards and procedures.
Good-Faith Decision-Making	Actions taken honestly and reasonably, using the guidance and information available at the time, without intent to circumvent copyright law or College policy.
Local Practice	An internal operational document that describes how specific institutional activities are carried out in support of College policies and procedures.
Sampling	The limited, aggregate review of course-reading distribution practices for the purpose of identifying general trends or institutional copyright risks. Sampling is not used to evaluate individual faculty or courses.

Supporting Information	
Related Policies, Forms, Documents, Websites	Collective Agreement(s) Copyright for Teaching, Learning, and College Activities Guideline Copyright Policy Submitting and Sharing Course Readings Procedure Supported Digital Systems and Platforms for Course Readings College Standard