



PURPOSE

Ontario school boards/authorities should use this checklist as they feel appropriate as a means of gauging how aware staff are about protecting privacy. Staff should reflect upon their responses and act when they can. This is an awareness-enhancing exercise first.

Introduction

In accordance with the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*, the *Personal Health Information Protection Act (PHIPA)*, and the *Personal Information Protection and Electronic Documents Act (PIPEDA)*, all Ontario school board/authority employees are responsible for the protection of personal, confidential, and sensitive information entrusted to them. They should be aware of privacy policies, procedures, and practices. Personal information is secured and protected from unauthorized access, disclosure, and inadvertent destruction by adhering to safeguards appropriate to the sensitivity of the information.

This tool is designed to raise your level of awareness of privacy issues. Do not hesitate to contact your school board’s/authority’s Freedom of Information Coordinator at telephone number _____ if you have any questions.

DO YOU FOLLOW YOUR PRIVACY POLICY AND/OR PROCEDURE?

A. Security of Personal, Confidential, or Sensitive Information	Yes	No	N/A
1. Are all hard copies of personal, confidential, or sensitive information stored in lockable filing cabinets?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Have I safeguarded all electronic personal information records maintained in password-protected databases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Do I refrain from storing personal, confidential, or sensitive information on a Shared Network Drive?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Do I immediately pick up any personal, confidential, or sensitive records sent to printer, photocopier or received by fax?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. If I notice personal, confidential, or sensitive information left at the printer/copier/fax machines, do I immediately retrieve them and/or return them to the owner?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Before sending personal, confidential, or sensitive information via email, have I considered taking precautions such as removing personal information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



	Yes	No	N/A
<p>7. Have I considered alternatives to faxing personal, confidential, or sensitive information? If such information must be faxed, have the following precautions been taken:</p> <ul style="list-style-type: none"> • Ensure that a fax cover sheet is used that contains contact information of both the sender and recipient with the mention “Confidential”? • Call the intended recipient immediately before and after sending the fax to ensure receipt and immediate pick-up? • Print and check a confirmation activity sheet to ensure that the fax reached its intended recipient? • Retrieve originals from the fax machine as soon as completed? 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>8. If it is necessary to take information out of the office, have all necessary precautions been taken to ensure that it is protected? Is it possible to only take non-confidential/ sensitive information? If not, do I have managerial approval to take personal, confidential, or sensitive information from the workplace?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>9. Are computer access rights reviewed and updated regularly to ensure that I do not have access to personal information that I do not need to perform my duties and responsibilities?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>10. Am I following the procedures in place for safeguarding personal information on laptops, memory sticks, personal digital assistants (PDAs, e.g., BlackBerry devices), etc.?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

B. Limitation of Collection, Use, Retention, and Disclosure of Personal Information	Yes	No	N/A
<p>1. Do I need to collect, use, or disclose identifiable personal information to perform my duties and responsibilities?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>2. If I need identifiable personal information, do I need to obtain the consent of the individual to whom the information relates before collecting, using or disclosing their personal information?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>3. Do I limit my collection, use, or disclosure of personal information to only that which I require to perform my duties and responsibilities?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>4. Is there a clear purpose for each type of personal information that I collect, use, retain, or disclose?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



	Yes	No	N/A
5. Do I provide a notice to individuals whenever their personal information is collected, e.g., on forms, surveys, websites, etc.?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Is all the personal information that I use or disclose utilized for the purpose for which it was collected, or for a consistent purpose?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Do all notices of collection that I use provide the specific purposes of collection, the legal authority for collection, and the contact information for an official who can answer questions about the purposes of collection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Do I know who in my workplace is responsible for maintaining records retention schedules?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Do I securely dispose of (i.e., destroy or store) personal, confidential, or sensitive information in accordance with established records retention schedules?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Do I know when it is appropriate to destroy personal, confidential, or sensitive information? When destroying such information, do I place it in the appropriate shredding bins?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Am I aware that all information stored in the memory of electronic devices (e.g., personal computers, printers, photocopiers, fax machines, etc.) has to be deleted permanently prior to their removal from the office?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

C. Workstation Security

	Yes	No	N/A
1. Am I using a password-protected screen saver and is it set to turn on after five minutes of inactivity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Do I always log off or sign out of applications I am not using, and close the browser window?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Do I always shut down my computer at the end of the day?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Have I positioned my monitor so that casual observers cannot view personal, confidential or sensitive information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Have I adopted a “clean desk” model so that no personal, confidential or sensitive information or material is left unsecured at my desk?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Do I make a habit of checking that my desk drawers, filing cabinets, and/or door are locked when I leave for the day?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:



D. Accuracy	Yes	No	N/A
1. Am I following the procedures in place to update personal information to ensure that it is still accurate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Am I following the procedures in place so that individuals can update their own personal information so that it is still accurate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Am I following the procedures in place for informing third party service providers to whom personal information has been disclosed that the information has been updated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Do I note on the record if individuals have disputed the accuracy of their personal information, so that subsequent users of the personal information are aware of it?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

E. Third-Party Service Providers	Yes	No	N/A
1. When personal information is shared with, or collected, used or disclosed by a third party service provider under an arrangement with the Ontario school board/authority, am I making sure that the provider follow its own privacy policies, procedures, and practices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Am I verifying that there is a written agreement in place with any third party service provider with which I am sharing personal information, or if the provider has permission to collect, use, or disclose personal information on behalf of the Ontario school board/authority?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. If the answer to the question above is “Yes,” do I monitor compliance with any agreement with a third party service provider?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

F. School and Classroom	Yes	No	N/A
1. Ontario Student Records (OSR) and Office Index Cards are securely stored in the main office of the school and are only accessible by authorized personnel in the main office of the school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. School staff have received training and are aware of the Ontario School Board/ Authority’s Privacy and Access to Information Policy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Teachers’ and administrators’ notes and other instruction-related information about students is secured in the classroom or office in the school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



	Yes	No	N/A
4. Information about a student(s) is shared only with other staff in the school who are assigned to work with the student(s), and only as needed to improve the education of the student(s).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Full names of students and other personal information and/or photographs do not appear on work displayed in the school, on websites and/or in newsletters.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Information related to student(s) is shared outside the classroom for educational purposes only with consent or notification of parent(s) or guardian(s).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

G. Privacy Breaches	Yes	No	N/A
1. I am aware of my obligation to immediately report a suspected or actual privacy breach to my supervisor and the school board's/authority's Freedom of Information Coordinator.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. I am aware of the Ontario school board/authority's "Responding to a Suspected Privacy Breach" protocol?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: