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## PURPOSE

*The purpose of this template is to provide users with a document modeling a set of minimum requirements for a privacy policy. School boards/authorities may adapt and include other elements into a privacy policy document as determined by local needs and circumstances such as Special Education Services. This may include more detailed guidelines for specific departments, such as special education, which would also be consistent with the school board/authority privacy policy.*

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## Policy

It is the policy of (name of school board/authority) to collect, use, retain and disclose personal information in the course of meeting its statutory duties and responsibilities. The school board/authority is committed to the protection of privacy and complies with all applicable provisions in the *Education Act*, the *Municipal Freedom of Information and Protection of Privacy Act*, the *Personal Health Information Protection Act*, and any other applicable legislation.

## Rationale

The (name of school board/authority) only collects personal information when it is necessary for providing for the education for students and/or the employment of school board/authority employees or as required and authorized by law. The school board/authority operates under the authority of the *Education Act* and its associated regulations.

The management of personal information collected by the school board/authority for these purposes is in accordance with the provisions of the *Education Act*, the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), and the *Personal Health Information Protection Act* (PHIPA).

## Guidelines

The protection of personal information held by the school board/authority is guided by the principles contained in the Ontario School Board/Authorities Privacy Standard.

### 1. Accountability and Responsibility

Under MFIPPA, the school board/authority is responsible for personal information under its control and may designate in writing an individual(s) within the school board/authority who is accountable for compliance with privacy legislation.

Under PHIPA, health information custodians are responsible for personal health information in their custody and control and may designate an individual within their school board/authority as an agent to assist with compliance to privacy legislation.



## 2. Specified Purposes

The school board/authority shall identify the purpose(s) for which personal information is collected, and individuals shall be notified of the purposes and any other information required by law at or before the time personal information is collected.

## 3. Consent

Personal information is collected for the provision of educational services to students. The knowledge and, in some cases, the consent of an individual is required for the collection, use, retention, and disclosure of personal information, except where otherwise permitted by law.

## 4. Limiting Collection

The school board/authority shall limit the collection of personal information to that which is necessary for its specified purposes in accordance with its statutory duties and responsibilities.

## 5. Limiting Use, Retention, and Disclosure

The school board/authority shall not use, retain, or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as authorized or required by law. The school board/authority shall retain personal information in accordance with the school board/authority retention schedule.

## 6. Accuracy

The school board/authority shall ensure that personal information is accurate, complete, and up-to-date in order to fulfill the specified purposes for its collection, use, disclosure, and retention.

## 7. Safeguards

The school board/authority shall ensure that personal information is secured and protected from unauthorized access, use, disclosure, and inadvertent destruction by adhering to safeguards appropriate to the sensitivity of the information.

## 8. Openness and Transparency

The school board/authority shall make available to the public specific information about its policies and practices relating to the management of personal information.

## 9. Access and Correction

Upon request, the school board/authority shall allow an individual to access his/her personal information and will be given access to that information in accordance with privacy legislation, subject to any mandatory or discretionary exceptions. An individual has the right to challenge the accuracy and completeness of the information and to request that it be amended as appropriate or to have a letter/statement of disagreement retained on file. Any individual to whom the disclosure of the personal information has been granted in the year preceding a correction has the right to be notified of the correction/statement. An individual is advised of any third party service provider requests for his/her personal information in accordance with privacy legislation.

## 10. Compliance

An individual shall have the ability to address or challenge compliance with these principles and in accordance with the school board's/authority's guideline/procedure.



## Administrative Procedures

The Director of Education is authorized to provide the administrative procedures necessary to implement this policy.