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## PURPOSE

*The purpose of this guideline is to assist school board/authority employees in developing privacy notification statements for websites, along with forms (paper and electronic), emails, and facsimiles.*

*Privacy notification statements explain how personal information (i.e., information capable of identifying an individual) will be treated as individuals interact with a school board/authority or school. In addition, privacy notification statements assure both internal and external publics that the personal and confidential information they provide to a school board/authority and/or school will be handled appropriately. A privacy notification statement must be posted on all websites, paper and electronic forms, facsimiles, and emails which collect personal information in identifiable form—that is, information that is personal in nature and which may be used to identify an individual.*

*Examples of personal information: Name, date of birth, age, sex, gender, racial ethnicity, social insurance number, patient/physician ID, employee number, photo, voiceprint, fingerprint, home address/phone/email, educational background, financial transactions, medical history, criminal or employment history, or any other identifying number, symbol, or other identifying particular assigned to the individual.*

*School boards/authorities should document their position on the use of privacy notification statements within their board in order to make employees aware of their responsibilities relating to the collection, use, disclosure, and retention of personal and confidential information. To that end, this guideline is being put in place to ensure that the information contained in privacy notification statements is accurate and appropriate for the school board/authority and/or school.*

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## Overview

Privacy is a major concern of students, parents, school board/authority employees, volunteers and service providers. Concerns include a lack of transparency regarding the use and disclosure of personal information and about the security of their personal information.

The *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) and the *Personal Health Information Protection Act* (PHIPA) govern the conditions under which school boards/authorities and/or schools may collect, use, and disclose personal information and how individuals must be informed when a school board/authority and/or school is collecting this information.

Schools and/or school boards/authorities have a wide variety of reasons for collection and use of personal information. For this reason, it is impossible to develop a single privacy notification statement for all circumstances personal information might be collected, used, and disclosed. This document is meant to provide guidance to school boards/authorities and school staff about different types of privacy notification statements that might be included, given a particular circumstance.



The purpose of collection will determine what kind of privacy notification statement you require. For example, a very simple form or website that just provides information may only require a general privacy notification statement. However, forms and websites that collect personal information from users need to ensure that the requirements of the MFIPPA and/or PHIPA are met. This guideline provides sample privacy notification statements from which school boards/authorities and/or schools can build a privacy notification statement that is appropriate for their circumstances. This document includes sample privacy notification statements to show what a complete privacy notification statement might look like.

Placement of a privacy notification statement is also a very important consideration. Guidelines on the placement of the privacy notification statement on a form, facsimile, and website are included.

## Definition

Privacy notification statements outline the responsibilities a school board/authority and/or school has regarding collection, use, disclosure, and retention of personal and confidential information in order to inform internal and external individuals. MFIPPA at s.28(2) states: “No personal shall collect personal information on behalf of an institution unless the collection is expressly authorized by statute, used for the purposes of law enforcement or necessary to the proper administration of a lawfully authorized activity.” MFIPPA at s.29(2) states: “If personal information is collected on behalf of an institution...shall inform the individual to whom the information relates of;

- a) the legal authority for the collection;
- b) the principal purpose or purposes for which the information is intended to be used; and
- c) the title, business address and business telephone number of an officer or employee of the institution who can answer the individual’s questions about the collection.”

In addition, this guideline recommends that, if possible, school boards/authorities and/or schools also include the following information:

- where/how the information will be stored;
- the retention period;
- who will use the information; and
- who will get copies of the information.

## Guidelines

- The Privacy Notification Statement must be inserted at the point at which an individual is asked to provide the information.
- Developing a website privacy notification statement is not easy. The end result should help users to understand and what information is being collected about them and how it is to be used. Moreover, the privacy notification statement should reflect the school board’s/authority’s and/or school’s actual organizational practices and how the website is operated technically.
- Privacy notification statements must occur whenever personal information about an identifiable individual is captured or recorded. All data collected must be needed for each individual from whom it is collected.



- A school board/authority and/or school may use personal information only to the extent necessary to enable the school board/authority and/or school to carry out the activity for which it was collected in a reasonable manner.
- Privacy notification statements should be printed on every collection form itself, whether paper or electronic, and on a separate or covering document that is a guide to the completion of the form, if applicable.
- Privacy notification statements should not be shaded and the type size should allow the notification to be clearly readable with average vision, preferably of the same type size as the rest of the body of the form.
- The design of forms should place the privacy notification statement either at the top of the form (before any personal information is collected) or at the bottom of the form just above the signature line.
- Personal information must be retained for a minimum of one year following the use of the information. If it is retained longer to satisfy the retention period then the longer of the two need to be stated on the form.
- When developing privacy notification statements, include expertise from IT, the school board's/authority's Freedom of Information/Protection of Privacy Coordinator, the school board's/authority's Records Manager, communications staff, and staff from the program area. If possible, also get legal counsel to participate in the process. Bringing together this expertise will ensure that:
  - practices comply with the MFIPPA and/or PHIPA;
  - program needs are met and IT processes are understood.
- Appoint one person (perhaps from Communications) to take responsibility for drafting. This way, the group can concentrate on the content, and “writing by committee” can be avoided.
- Consider submitting the final privacy notification statement to the legal counsel for the school board and, if appropriate, to the Communications department before finalizing and publishing it to your site. Consider having the privacy notification statement reviewed by the Office of the Information and Privacy Commissioner.

## Developing a Website Privacy Notification Statement

- Before developing a privacy notification statement for the school board/authority and/or school website, consider how the website is used (e.g., broadcasting static information, providing customized entry points, conducting functions that collect personal information); think about the target audience and how knowledgeable they are about how websites operate; and the technical operation of your site (e.g., does it use cookies, what data is captured automatically).
- Websites change constantly with respect to new content and function. Consider reviewing the privacy notification statement regularly to ensure that it is still appropriate.
- A link to the privacy notification statement must be provided from every page of the website.
- School board/authority and/or school stakeholders are knowledgeable about privacy issues; therefore, consider giving prominence to the privacy notification statement on the home page. This is an increasingly frequent practice among private and public sector organizations to show their commitment to protecting the privacy of users.
- If users can conduct transactions on the site (for example, filling out a form or application), provide a link to the general privacy notification statement for the website. As well, a specific privacy notification statement should be created regarding the use and authority for the information to be collected on the form, just as it would on paper-based transactions with stakeholders.



- A good website privacy notification statement contains multiple parts. Each part addresses specific concerns of users or specific aspects of personal information that may be collected depending on how the website is built and operated and how the users use the site.
- Use the chart below to determine what parts need to be included in your privacy notification statement. You will notice that many of the parts will be appropriate to most sites. These parts are identified with a check mark.
- By using this checklist, you can ensure that the school board’s/authority’s privacy notification statement reflects both how its site is used and its operational practices.

### Key Parts of a Web Site Privacy Notification Statement

Which of the following situations apply to your Web site?		Build your own Privacy Notification Statement using these models.
You are primarily posting information and need a broad general Privacy Notification Statement.	<input checked="" type="checkbox"/>	General Privacy Notification Statements
You collect usage statistics automatically.	<input checked="" type="checkbox"/>	Information Collected and Stored Automatically
Your site is monitored for security protection.	<input checked="" type="checkbox"/>	Security
Your site provides links to other sites.	<input checked="" type="checkbox"/>	Privacy and Links to Other Sites
Your site enables visitors to submit information through emails and web forms.	<input type="checkbox"/>	Information Collected in Emails and Web Forms
Your site includes transactions (e.g., online forms, applications) where personal information enters a system of records in your organization.	<input type="checkbox"/>	Transactions Where Information Enters a System of Records
Users may ask for information about who to contact about your privacy policy.	<input checked="" type="checkbox"/>	Getting More Information

## General Website Privacy Statements

Websites can provide a first impression of the school board/authority and/or school. A clearly presented general policy on privacy can reassure users that the information you collect about them will be handled appropriately. General privacy notification statements are appropriate for sites that only post information-where users are browsing, searching, and downloading information from the site. General privacy notification statements should be written in plain language and tell users what, if any, information is collected when they visit the site. If the site does not use cookies or other tools for collecting user information, it is wise to state this in the general privacy notification statement. Here are two examples of ‘general’ privacy notification statements.



### Example 1:

We are committed to providing our visitors with a Web site that respects their privacy. This page summarizes the privacy policy and practices of the (NAME OF SCHOOL BOARD/AUTHORITY/SCHOOL) Web site.

We do not automatically gather any personal information from you, such as your name, phone number, email or address. This information is only obtained if you supply it voluntarily, usually through contacting us via email or registering in a secure portion of the site.

Any personal information you do provide is managed according to the Municipal Freedom of Information and Protection of Privacy Act. This means that, at the point of collection, you will be informed that your personal information is being collected, the purpose for which it is being collected and that you have a right of access to the information.

This Web site does not use “cookies” or any other means of collecting information about you or your computer without your knowledge. (A “cookie” is a file placed on your hard drive by a Web site that allows the Web site to monitor your use of the site, usually without your knowledge.)

### Example 2:

Thank you for visiting the (NAME OF SCHOOL BOARD/AUTHORITY/SCHOOL) Web site and reviewing our privacy policy. Our privacy policy is clear: We will not collect personal information about you when you visit our Web site unless you choose to provide that information to us.

We do not regularly use “cookies” to track how our visitors use the site. Whenever we enable “cookies” to facilitate your transactions, we will first inform you.

Here is how we handle information about your visit to our Web site: (INSERT APPROPRIATE NOTES).

## Information Collected and Stored Automatically

Often, websites routinely collect information about visitors to assess traffic and usage of a site. School boards/authorities might have the technical capability to collect information and later take additional steps to identify people (e.g., looking up static Internet Protocol (IP) addresses that may be linked to specific individuals).

Privacy notification statements should state clearly what information you are collecting automatically. More importantly, your statement should reflect whether you intend to make this information identifiable, or to use it only for statistical purposes.

If the school board/authority and/or school site is using cookies, the privacy notification statement should state how it is using cookies (e.g., persistent cookies or session cookies.)

### Example 1:

*Here is an example of a simple privacy notification statement reflecting the fact that one’s IP address is not used to link activity to a particular individual.*

The (NAME OF SCHOOL BOARD/AUTHORITY) uses software that receives and records the Internet Protocol (IP) address of the computer that has contacted our Web site.

We make no attempt to link these addresses with the identity of individuals visiting our site.



### Example 2:

*You may want to be more specific about the type of information that is collected automatically during a visit to the site, as in the following example.*

If you do nothing during your visit but browse through the website, read pages, or download information, the (NAME OF SCHOOL BOARD/AUTHORITY) will automatically gather and store certain information about your visit. This information does not identify you personally. We automatically collect and store only the following information about your visit:

- the Internet domain (for example, “xschoolboard.ca” if you use a private Internet access account) and IP address (an IP address is a number that is automatically assigned to your computer whenever you are surfing the Web) from which you access our website;
- the type of browser and operating system used to access our site;
- the date and time you access our site;
- the pages you visit; and
- if you linked to the (NAME OF SCHOOL BOARD/AUTHORITY) website from another website, the address of that website.

The (NAME OF SCHOOL BOARD/AUTHORITY) uses this information to help us make our site more useful to visitors-to learn about the number of visitors to our site and the types of technology our visitors use. We do not record information about identifiable individuals and their visits.

### Example 3:

*Not all IP addresses can be tracked to an individual. The following statement reflects this fact.*

When you visit the (NAME OF SCHOOL BOARD/AUTHORITY) website, the web server automatically collects a limited amount of information essential for the operation and security of our website and the other sites that reside on the server. Some of this information (e.g., browser type) does not identify who you are. Other information, such as your Internet domain name or IP address, may identify you depending, in large part, on the naming standards followed by your Internet service provider.

### Example 4:

The following statement acknowledges that personal information may be collected but not used to identify an individual. It is based on the vocabulary of the World Wide Web Consortium’s Privacy Preferences Project (P3P). A P3P standard is not yet finalized. Because of its technical nature, this type of statement may be more suited to a knowledgeable group of users.

(NAME OF SCHOOL BOARD/AUTHORITY/SCHOOL) logs http requests to our server. These logs capture computer information and navigation and click stream data, such as the originating IP (e.g., 204.41.227.10) address of an agent requesting a URL and the email address of the site visitor if they have included it in their browser. This data is used in non-identifiable form for website and system administration purposes.

Logged information is not disclosed outside of (NAME OF SCHOOL BOARD/SCHOOL) personnel or those under contract to conduct maintenance to web server components. The logs are permanently archived as raw research material. The logs may not be accessed, opted out of, or changed by server users.



A user may have questions about who has access to information collected, as outlined above. It might be appropriate to include information about when the MFIPPA and PHIPA might permit disclosure of information that can be made identifiable. Moreover, even if the information is intended to be used internally, there might be cases where school boards/authorities are required by law to surrender the files. Users should be told of this possibility.

On these issues, it is wise to consult the school board's/authority's legal counsel to ensure that the privacy notification statement accurately reflects actual practice or likely practice in the near future.

#### Example 5:

*The following example clearly states that no one will have access to personal information except in cases where the school board is required to disclose the information.*

The (NAME OF SCHOOL BOARD/AUTHORITY) records your visit and logs the following information for statistical purposes—your server's address; the name of the top-level domain from which you access the Internet (for example, .gov, .com, .ca, .org, etc); the type of browser you use; the date and time you access the site; the pages you have accessed and the documents you have downloaded, and the previous Internet address from which you linked directly to the site.

We will not identify users or their browsing activities, except as required by a law of Ontario or Canada or if we are compelled to produce this information for a legal proceeding.

Cookies are a common method of collecting information about users. If your site uses cookies, you should be explicit about:

- how you are using the cookies;
- how long the cookie will reside on their machine; and
- how the user can reject the cookie or disable this function.

#### Example 6:

*The following example is one that has been reviewed by the Alberta Office of the Information and Privacy Commissioner and is currently used on the Travel Alberta website. It states that cookies are being used. It describes what a cookie is and how it is used on the site. It also describes how the user can disable the cookie. Finally, it is explicit about how long the cookie will reside on the user's machine.*

This website uses “cookies.” Cookies are small amounts of information that are distributed to web browsers to assist you when you return to this site or a specific area on the site. The cookie used here retains session information, or more specifically, the options selected to determine your itinerary. If you have concerns about this, you can change the settings on your web browser to not accept this information or to display warning messages when this is about to occur. Cookies are not retained by the site but reside on your machine and are marked for removal by your browser after a period of 28 days.



**Example 7:**

*The following example is more explicit about how the cookies are used on the site. In this case, the cookie expires 30 minutes after the last time the cookie was modified.*

We only enable “cookies” for our searchable Frequently Asked Questions (FAQ) database, and then only for the feature that allows you to register to be notified when a question is modified. A cookie is a small piece of text information that is sent to your browser-along with a Web page-when you access a website. Your browser will only return this cookie information to the domain where the cookie originated. No other site can request it.

In the case of our searchable FAQ database, the cookie helps us remember you if you request to be notified of a change of a question. If you choose to disable cookies, you may still request that you be notified when a question is changed, but you will be required to enter your email address for every question you wish to be notified about. The cookie will expire 30 minutes after the last time the cookie was modified. This expiration time does not delete the cookie from your PC, but it does make it invalid and we can no longer use that cookie. No other website can use this cookie under any circumstances. If you wish to delete this (or any cookie), that is a function of your web browser and you should consult the software’s Help files.

**Example 8:**

*It may also be helpful to tell people what the impact of disabling the cookie will be, as in the following example.*

(NAME OF SCHOOL BOARD/AUTHORITY WEBSITE) does not use persistent cookies (persistent tokens that pass information back and forth from the client machine to the server). We do use session cookies (tokens that remain active only until you close your browser) in order to make the site easier for you to use. We DO NOT keep a database of information obtained from these cookies.

We use cookies in the following ways:

- To save you time in filling out forms. When you close your browser, the cookie is deleted from your computer.
- To maintain a relationship between the image and the correct link, the program that displays the banners on the bottom of some of our pages uses a session cookie. When you close your browser, the cookie is deleted from your computer.

You can choose not to accept these cookies and still use the site, but it may take you longer to fill out the same information repeatedly and clicking on the banners will not take you to the correct link. Refer to the help information in your browser software for instructions on how to disable cookies.





## Security

*School board/authority websites are usually monitored to maintain system security. Your privacy notification statement should contain a statement related to this activity.*

### Example 1:

The following example notifies the reader of the maintenance of usage logs and how they may be accessed. It also identifies how long the logs are maintained.

For site security purposes and to ensure that this service remains available to all users, this (NAME OF SCHOOL BOARD/AUTHORITY) computer system employs software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage.

Except for authorized law enforcement investigations, no other attempts are made to identify individual users or their usage habits.

## Privacy and Links to Other Web Sites

One of the advantages of the Web is the ability to link to other information. Almost all school board/authority websites have links to other organization, agency and/or government sites as well as non-government sites. In these cases, the privacy notification statement should contain a notice to the user that if they go to another site from yours, the privacy policy of that site may be different.

### Example 1:

*The following example states that the school board/authority is not responsible for the privacy policy of other sites that it may be linked to. It also encourages users to look at the privacy policy of sites they visit.*

This website contains links to other sites. We are not responsible for the content and the privacy practices of other websites and encourage you to examine each site's privacy policy and disclaimers and make your own decisions regarding the accuracy, reliability, and correctness of material and information found.

### Example 2:

*Sometimes, your site may warn the user that they are leaving your site. If this is the case, the following example tells the user that the school board/authority cannot be responsible for the practices of linked sites, but that they will be warned before leaving your site.*

Our website has links to many other sites. Before leaving the (NAME OF SCHOOL BOARD/AUTHORITY) website, a page will appear informing you that you are leaving our server. Once you link to another site, you are subject to the privacy policy of the new site. You should review the privacy policy and disclaimers of the new site you are going to.



## Information Collected in E-mails and Web Forms

Most school board/authority websites allow the user to email an employee of the department (e.g. “feedback” to the webmaster). Many sites also have forms that users can fill out to receive further information, become part of a mailing list or listserv, or join a discussion group.

Almost all of these instances involve the collection of personal information. The privacy notification statement should clearly state how this information is to be used, if and how it will be retained, and to whom (and in what form) it may be disclosed.

It is also a good practice to warn the person that, while the information submitted will be protected once it reaches your site, the Internet is not totally secure and that you cannot ensure that the information will be protected during transmission to your site.

### Example 1:

*In the following example, the use of the personal information submitted is described. It also describes who has access to this information.*

If you join an (NAME OF SCHOOL BOARD/AUTHORITY) online discussion group, we may ask you to volunteer personal information such as your name and email address for the purposes of effective administration of the discussion group. In some cases, our groups are limited to member-only discussions and as such can not be accessed by the general public. We will notify you as to whether you are joining a closed (limited) or open (public) discussion.

Any personal information you supply will not be disclosed to anyone except (NAME OF SCHOOL BOARD/AUTHORITY) personnel who need the information (e.g., to respond to your request).

### Example 2:

*The following example explains that emails are treated the same way as letters sent to your organization.*

If you choose to provide us with personal information-as in an email or by filling out a form with your personal information and submitting it to us through our website-we use that information to respond to your message and to help us get you the information you have requested.

We treat emails the same way we treat letters sent to (NAME OF SCHOOL BOARD/AUTHORITY). We only share the information you give us with another school board department if your inquiry relates to that department.

Moreover, we do not create individual profiles with the information you provide or to give it to any private organizations. (NAME OF SCHOOL BOARD/AUTHORITY) does not collect information for commercial marketing.

### Example 3:

*The following example warns users that the information they provide may not be secure before it reaches your site.*

Messages sent via the Internet can be intercepted. If you are concerned about sending your personal information to us via the Internet, you can use another method such as fax or regular mail. For more help, call (NAME OF SCHOOL BOARD/AUTHORITY) at (TELEPHONE NUMBER).



## Transactions where Information Enters a System of Records

As more and more school boards/authorities use the Internet to carry out transactions with stakeholders, personal information protected by the MFIPPA and PHIPA will be collected. In these instances, it is good practice to conduct a Privacy Impact Assessment (PIA).

In cases where traditional paper collections of information are supplemented or replaced by electronic forms offered through a website, the rules of the MFIPPA and PHIPA continue to apply.

For situations where a notice is required in the paper-based world, the general principle is that the equivalent notice is required in the online world. You should have a link to the appropriate privacy notification statement at the point where the information is collected.

In these cases, as with current practices in service delivery that do not involve the Internet, the MFIPPA and PHIPA place restrictions on what information may be collected.

Web visitors also like to know how long their personal information is kept.

### Example 1:

*In the following example, the privacy notification statement contains a generic reference to the MFIPPA and PHIPA. The example also states (in general terms) how the information will be used and how long it will be kept.*

The information provided on this application is for the purpose of determining eligibility for the (Autistic Student CASA Program) under s. \_\_\_\_\_ of the Education Act and will be retained for \_\_\_\_\_. If you have any questions regarding the collection of this information, please contact (title of an individual) within Special Education Services at the address or phone number provided.

### Example 2:

We are collecting this personal information to determine and verify your eligibility for Special Education programs. We do so pursuant to s.170(1) of the Education Act. Your personal information is protected by the privacy provisions of the Municipal Freedom of Information and Protection of Privacy Act and the Personal Health Information Protection Act and will be retained for \_\_\_\_\_. If you have any questions about the collection of this information, you may contact (title of an individual) within Special Education Services at (Area Code) (Telephone Number).

### Example 3:

Any personal information that we ask you to provide via our website is collected in compliance with the Municipal Freedom of Information and Protection of Privacy Act and/or the Personal Health Information Protection Act. We collect only what is necessary for the operation of the website and the provision of requested materials to you. The information is used only for the purpose it was collected or for a consistent purpose. Further, we keep the information only for the length of time necessary to fulfill the purpose for which it was collected or one year, whichever is shorter.



## Getting More Information

There may be users that have concerns or questions about the school board's/authority's privacy policy. Therefore, it is a good idea to include information about whom to contact if the user has questions.

Here are two examples of simple statements that can be used at the end of your privacy notification statement to help users who may have questions.

### Example 1:

For more information about any of the policies described above or about our school board website in general, please contact us:

- By email: (EMAIL ADDRESS)
- By telephone: (TELEPHONE NUMBER)
- By fax: (FAX NUMBER)

### Example 2:

If at any time you have questions about our privacy policy, please notify the Freedom of Information /Protection of Privacy Coordinator for the school board by email at (EMAIL ADDRESS).

If you do not wish to send your request using email, you can send it in writing to the following postal address: (INSERT ADDRESS).

## Sample Privacy Notification Statements for Websites

Here are two sample privacy statements that were developed to meet specific needs of particular sites. They are included here to give you an idea of how different parts of the privacy notification statement can be put together to form a cohesive, easy-to-read statement.

### Example 1:

The (NAME OF SCHOOL BOARD/AUTHORITY) has developed this site as a resource for individuals wanting information about the (NAME OF SCHOOL BOARD/AUTHORITY). We are committed to providing our visitors with a website that respects their privacy. This page summarizes the privacy policy and practices on the (NAME OF SCHOOL BOARD/AUTHORITY) websites.

We do not automatically gather any personal information from you, such as your name, phone number, or email address. This information is only obtained if you supply it voluntarily, usually through contacting us via email, or registering in a secure portion of the site.

Any personal information you do provide is protected under the Municipal Freedom of Information and Protection of Privacy Act and/or the Personal Health Information Protection Act. This means that, at the point of collection, you will be informed that your personal information is being collected, the purpose for which it is being collected, and that you have a right of access to the information.

We use software that receives and records the Internet Protocol (IP) address of the computer that has contacted our website. We make no attempt to link these addresses with the identity of individuals visiting our site.



We do not regularly use “cookies” to track how our visitors use the site. Whenever we enable “cookies” to facilitate your transactions, we will first inform you.

Visitor information is not disclosed to anyone except the (NAME OF SCHOOL BOARD/AUTHORITY) personnel who need the information, e.g., to respond to a request.

This website contains links to other sites. We are not responsible for the content and the privacy practices of other websites and encourage you to examine each site’s privacy policy and make your own decisions regarding the accuracy, reliability and correctness of material and information found.

For questions or comments regarding this policy, or for additional information about the administration of the (NAME OF SCHOOL BOARD/AUTHORITY), please visit our website at [www.xxxxxxxx](http://www.xxxxxxxx) or contact us:

- By email: [Email Address]
- By telephone: [(Area Code) Phone Number]
- By fax: [(Area Code) Fax Number]

### Example 2:

#### Privacy commitment

The (NAME OF SCHOOL BOARD/AUTHORITY) respects the privacy of our stakeholders. We pledge to never release your personal information (i.e., name, address, telephone number, email address) to anyone who is not employed or contracted by us to provide a service to you. We will only use this information to serve you better.

The (NAME OF SCHOOL BOARD/AUTHORITY) may from time to time, with your permission, send you information we feel will be of use to you. If you prefer not to receive this type of information in the future, just let us know by contacting us (see below) and we will take you off our mailing list.

#### Information collected via the Internet

When you visit the (NAME OF SCHOOL BOARD/AUTHORITY) website, the web server automatically collects a limited amount of information essential for the operation and security of our website and the other sites that reside on the server. Some of this information (e.g., browser type) does not identify who you are. Other information, such as your Internet domain name or IP address, may identify you depending, in large part, on the naming standards followed by your Internet service provider. You may wish to ask them about their policies and practices in this regard.

Messages sent via the Internet can be intercepted. If you are concerned about sending your personal information to us via the Internet, please call the (NAME OF SCHOOL BOARD/AUTHORITY) at (Area Code) (Telephone Number, Ext.).

#### Cookies

This website uses “cookies.” Cookies are small amounts of information that are distributed to web browsers to assist you when you return to this site or a specific area on the site. The cookie used here retains session information, or more specifically, the options selected to determine your itinerary. If you have concerns about this, you can change the settings on your web browser to not accept this information or to display warning messages when this is about to occur. Cookies are not retained by the site but reside on your machine and are marked for removal by your browser after a period of 28 days.



### **What other personal information we collect and how we use it**

Any personal information that we ask you to provide via our website is collected in compliance with the Municipal Freedom of Information and Protection of Privacy Act and/or the Personal Health Information Protection Act. We collect only what is necessary for the operation of the website and the provision of requested information to you. The information is used only for the purpose for which it was collected or for a consistent purpose. Further, we keep the information only for the length of time necessary to fulfill the purpose for which it was collected. (State any information here) information is collected, stored, and used only in non-identifying form.

### **Links to other websites**

This site contains links to other educational related websites. We are not responsible for the privacy practices of any sites you may visit after you enter the (NAME OF SCHOOL BOARD/AUTHORITY) site.

### **Questions?**

For more information about any of the policies described above or about our website in general, please contact us:

- By email: [EMAIL ADDRESS]
- By telephone: [(AREA CODE) TELEPHONE NUMBER]
- By fax: [(AREA CODE) FAX NUMBER]

### **Example 3:**

The (NAME OF SCHOOL BOARD/AUTHORITY) is committed to respecting your privacy and protecting your personal information. This privacy sStatement explains the current information management practices on our websites.

The handling of all personal information by the (NAME OF SCHOOL BOARD/AUTHORITY) is governed by the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), the Personal Health Information Protection Act (PHIPA), and the Education Act.

### **What kind of information is collected when you visit our websites?**

When you browse or download information from the (NAME OF SCHOOL BOARD/AUTHORITY) website, our servers automatically collect limited amounts of standard information for traffic monitoring and statistical purposes. The information is analyzed for operational trends and performance and for ways to improve the site. Examples of this type of information include:

- Internet Protocol (IP) address of the computers being used;
- dates and times our site is accessed;
- types and versions of the browsers used to access our sites and the operating systems of the computers being used;
- pages visited;
- names of the files requested.

In addition, we may use the IP address to address any potential security threats.

### **What happens when you give personal information online to the (NAME OF SCHOOL BOARD/AUTHORITY)?**

If you chose to voluntarily provide us via email with personal information, such as your name, address, phone number, or email address, to allow us to follow up on in an inquiry, any such information that you provide to us will be used to respond to your specific question.



If you would prefer to write, please send your letter to:

- The FOI/Records Manager  
NAME OF SCHOOL BOARD/AUTHORITY  
Address, Phone, Email Address, Fax

**Does the (NAME OF SCHOOL BOARD/AUTHORITY) use “cookies”?**

A “cookie” is a small text file that a website can store on your computer’s hard drive to collect information about your activities on the site or to make it easier to use certain site functions. The cookie transmits this information back to the website’s computer when you visit the site. If you do not want cookies stored on your computer, you can set your browser to warn you when a website attempts to place a “cookie” on your computer. For instructions on how to do this refer to website browser.

The (NAME OF SCHOOL BOARD/AUTHORITY) does/does not use cookies on its public website. (If so, why and when.)

**Does the (NAME OF SCHOOL BOARD/AUTHORITY) link to other websites?**

Some of our websites link to other websites created and maintained by other public and/or private sector organizations. These links are provided solely for your information and convenience. When you link to an outside website, you are leaving the (NAME OF SCHOOL BOARD/AUTHORITY)’s site and are subject to the privacy and security policies of that site’s owners. You are encouraged to read their privacy statements to understand how they handle personal information.

The (NAME OF SCHOOL BOARD/AUTHORITY) does not assume and is not responsible for any liability whatsoever for the linking of any of these linked websites, the operation or content (including the right to display such information) of any of the linked websites, nor for any of the information, interpretation, comments or opinions expressed in any of the linked websites. Any comments or inquiries regarding the linked websites are to be directed to the particular organization for which the particular website is being operated. Students are encouraged to consult with their parents before they link to an outside site.

**Accuracy of Content**

This information is provided as a public service. Although we endeavor to ensure that the information is as current and accurate as possible, errors do occasionally occur. Therefore, we cannot guarantee the accuracy of the information. Readers should, where possible, verify the information before acting on it.

**Whom can I contact for further information about my privacy on this site?**

Questions or comments regarding this statement may be directed to our (NAME OF SCHOOL BOARD/AUTHORITY) Freedom of Information/Protection of Privacy Coordinator or by phone at (Area Code) Phone Number, Ext., Email Address, Fax Number.

**Example 4:**

The (NAME OF SCHOOL BOARD/AUTHORITY) respects the privacy of its web visitors. Personal information on the Internet is protected in the same way it is protected in all other ways that are communicated and interacted with. Staff should adhere to strict policies that protect the confidentiality of any personal identifiable information such as names, email addresses and telephone numbers. The use of cookies is strictly prohibited except to provide data on a performance measure of meeting informational or service needs relative to the Internet site. The only



personal identifying information collected from use of the school board/authority website is from submitting comments, suggestions, or questions through a feedback form or an email. The school board will not sell, rent, or release personal information to third parties.

**Example 5:**

The (NAME OF SCHOOL BOARD/AUTHORITY) is committed to providing our staff, students, and visitors with websites that respect their privacy. This page summarizes the privacy policy and practices for all (NAME OF SCHOOL BOARD/AUTHORITY) websites. (NAME OF SCHOOL BOARD/AUTHORITY) websites do not automatically gather any personal information from you, such as your name, phone number, or email address. This information is only obtained if you provide it voluntarily through contacting us via email or via an online form. Any personal information you do provide is managed according to the Municipal Freedom of Information and Protection of Privacy Act and/or the Personal Health Information Protection Act. This means that, at the point of collection, you will be informed that your personal information is being collected, the purpose for which it is being collected, and that you have a right of access to the collected information. Some (NAME OF SCHOOL BOARD/AUTHORITY) websites may collect more information than is described here and will have additional privacy policies. Where applicable, please be sure to read these privacy policies.

**Information Collected Automatically via the Internet**

The (NAME OF SCHOOL BOARD/AUTHORITY) logs http requests to our server. These logs capture computer information, navigation and click stream data.

Some of the information collected does not identify who you are. Other information, such as your domain name or IP address, may identify you depending on the naming standards followed by your Internet service provider.

You may wish to ask them about their policies and practices.

While we make no attempt to link the information captured to the identity of individuals, the information captured does identify the following:

1. the Internet domain and IP address from which you access our website;
2. the type of browser and operating system used to access our site;
3. screen resolution of your monitor;
4. the date and time you access our site;
5. the pages you visit; and
6. if you linked to the (NAME OF SCHOOL BOARD/AUTHORITY) website from another website, the address of that website.

This information is used to help us make our site more useful to our audiences by learning about the number of visitors to our site and by monitoring traffic patterns and the types of technology our visitors use. We do not track or record information about specific individuals and their visits. Visitor information is not disclosed to anyone except (NAME OF SCHOOL BOARD/AUTHORITY) personnel who need the information for legitimate purposes such as responding to a request.





## Cookies

A cookie is a small piece of text information that is sent to your browser when you access a website. Your browser returns this cookie information to the domain where the cookie originated. While we do not regularly use cookies to track how our visitors use the site, when cookies are used, they may be used to help you fill in forms or track your use of the sites. The length of time that the cookie resides on your machine depends upon the specific setup of the particular sites you visit. If you are concerned about the use of cookies, you can refer to the help information in your browser software for information on how to disable cookies. If you wish to delete cookies from your machine, consult your browser's help files for instructions on how to do so.

## Cookies Used on Some Sites

A number of (NAME OF SCHOOL BOARD/AUTHORITY) websites (such as the one you are viewing now) use dynamically driven content. These pages use two specific cookies to define the parameters of the site you are visiting. These tokens are identified by your browser as CFIDE and CFTOKEN. These cookies do not gather or submit any information on users visiting the site.

## Security

For site security purposes, the (NAME OF SCHOOL BOARD/AUTHORITY) employs software programs to monitor network traffic in order to identify unauthorized attempts to upload or change information or to otherwise cause damage. Except for authorized law enforcement investigations, no other attempts are made to identify individual users or their usage habits.

## Privacy and Links to Other Sites

(NAME OF SCHOOL BOARD/AUTHORITY) websites may contain links to other sites. We are not responsible for the content and the privacy practices of other websites and encourage you to examine each site's privacy policy and disclaimers and make your own decisions regarding the accuracy, reliability, and correctness of material and information found.

## Information Collected in Emails and Web Forms

If you should choose to provide us with personal information-as in an email or by filling out a form and submitting it to us through our website-we will use that information to respond to your message and to help us get the information you have requested. The (NAME OF SCHOOL BOARD/AUTHORITY) does not collect personal information for commercial marketing or distribution to any private organizations.

Messages sent via the Internet can be intercepted. If you are concerned about sending your personal information to us via the Internet, you can use another method such as fax or regular mail.

## Transactions Where Information Enters a System of Records

Where personal information is provided that enters a system of records, it is collected in compliance with the Municipal Freedom of Information and Protection of Privacy Act. The (NAME OF SCHOOL BOARD/AUTHORITY) collects, creates, and maintains information for the purposes of admission, registration, and other activities directly related to its education programs. Information collected is only kept for the length of time necessary to fulfill the purpose for which it was collected.



### Getting More Information

For questions or comments regarding this policy, or for additional information about the administration of the Municipal Freedom of Information and Protection of Privacy Act and Personal Health Information Protection Act, contact the Freedom of Information and Privacy Coordinator for the (NAME OF SCHOOL BOARD/AUTHORITY).

### Links

(NAME OF SCHOOL BOARD/AUTHORITY) Freedom of Information/Protection of Privacy Coordinator  
Privacy Statement Guidelines for (NAME OF SCHOOL BOARD/AUTHORITY)

### Policy Statement

In the normal course of operation, the (NAME OF SCHOOL BOARD/AUTHORITY) generates and collects a significant amount of confidential information about current and former staff, students, and parents, as well as about (NAME OF SCHOOL BOARD/AUTHORITY) operations. The purpose of this policy is to promote safeguarding of, and controlling access to, confidential information; to prevent inadvertent disclosure of confidential information; and to protect the privacy of individuals and the integrity and reputation of the (NAME OF SCHOOL BOARD/AUTHORITY). The primary purpose of this policy is to make sure that the school board/authority does not inadvertently disclose confidential information.

Access to and disclosure of confidential information held by the (NAME OF SCHOOL BOARD/AUTHORITY) must be allowable, appropriate, necessary, and for a clearly defined purpose. No information should be provided to any person who does not have the right to access personal information without the signed consent of that individual.

## Website Terms of Use

The following statement may be considered for use when developing a website privacy notification statement.

### Example 1:

This website is maintained by (NAME OF SCHOOL BOARD/AUTHORITY) as a public service to students, parents, staff and site visitors from the community and beyond. The (NAME OF SCHOOL BOARD/AUTHORITY) cannot guarantee that all information is current or accurate. Website users should verify all information before acting on it. The (NAME OF SCHOOL BOARD/AUTHORITY) reserves the right to change or modify its terms, conditions, and notices under which use of the website is offered. Continued use of this website constitutes an agreement to all such terms, conditions, and notices.

Communications made through this website's email and messaging system should in no way be deemed to constitute legal notice to the (NAME OF SCHOOL BOARD/AUTHORITY) or any of its agencies, officers, employees, agents, or representatives, with respect to any existing or potential claim or cause of action against the (NAME OF SCHOOL BOARD/AUTHORITY) or any of its agencies, officers, employees, agents, or representatives.



## Sample Privacy Notification Statements - Forms

The Statement for the Authorization for Collection of Personal Information on both paper and electronic forms should include:

- Purpose for the collection - why do you need this personal information?
- What legislation entitles us to collect this information?
- Where will the information be stored?
- How long will the information be kept?
- Who will use the information?
- How or why they will use the information.
- Who can be contacted to answer questions regarding this collection?
- Who will get copies of this personal information?

Here are two sample privacy notification statements that can be used on forms (both electronic and paper). They were developed to meet specific needs of particular sites. They are included here to give you an idea of how different parts of the privacy statement can be put together to form a cohesive, easy-to-read statement.

### Example 1:

#### **MFIPPA Notification Statement (minimum type size - 8 pt.):**

The personal information requested on this form is collected under the authority of the Municipal Freedom of Information and Protection of Privacy Act and will be protected under that Act. It will be used for the purpose of (state specific uses for which the information is collected, authorized by [IDENTIFY STATUTE AND STATUTE SECTIONS - i.e., Education Act s. \_\_\_\_\_]). Direct any questions about this collection to: (contact position, full address, and business telephone number).

### Example 2:

#### **Information Collection Authorization:**

This information is collected pursuant to the board's responsibilities as set out in the section(s) \_\_\_\_\_ of the Education Act and the Municipal Freedom of Information and Protection of Privacy Act. The information will be used for educational purposes and stored in the Ontario Student Record (OSR) for 5 years after the student graduates or completes their education, unless otherwise removed in accordance with the Education Act. The information will be used by the principal, classroom teacher and central office Special Education Department staff for the purposes of \_\_\_\_\_. Questions about this collection should be directed to the principal of the school.

Copies:                      1. OSR                                      2. Parent (upon request)

## Sample Privacy Notification Statement - Email and Facsimile

This email contains information intended only for the individual or entity named in the message. If the reader of this message is not the intended recipient or the agent responsible to deliver it to the intended recipient, you are hereby notified that any review, dissemination, distribution, or copying of this communication is prohibited. If this communication was received in error, please notify us by reply email and delete the original message.



## Sample Privacy Notification Statement - Facsimile

This fax contains information intended only for the individual or entity named in the message. If the reader of this message is not the intended recipient or the agent responsible to deliver it to the intended recipient, you are hereby notified that any review, dissemination, distribution, or copying of this communication is prohibited. If this communication was received in error, please notify us and destroy the original fax.

## Conclusion

Privacy notification statements make employees aware of their responsibilities regarding the collection, use, disclosure, and retention of personal and confidential information. In addition, privacy notification statements assure both internal and external stakeholders that the personal and confidential information they provide to the school board/authority and/or school will be handled appropriately.

Developing privacy notification statements is not easy. Time and effort should be put into the development of privacy notification statements to ensure that they reflect the school board's/authority's actual operational practices.

## Sources

Many of the examples used in this guide were adopted from websites that have developed their own privacy statements. Privacy statements from the following organizations were useful in developing the examples used in this guide:

- The University of Alberta
- Australian Sports Commission
- Industry Canada
- Office of the Information and Privacy Commissioner (Ontario)
- Office of the Information and Privacy Commissioner (Alberta)
- U.S. Department of Defense
- U.S. Department of Justice
- Peterborough Victoria Northumberland and Clarington Catholic District School Board
- Toronto District School Board - Privacy Complaint No. MC06-63
- Simcoe County District School Board
- World Wide Web Consortium's Privacy Preferences Project (P3P)