

1. Purpose

The CDSBEO is committed to the protection of privacy and complies with all pertinent provisions in the *Education Act*, the *Municipal Freedom of Information and Protection of Privacy Act*, (the *MFIPPA*) the *Personal Health Information Protection Act*, and any other applicable privacy legislation.

The Board only collects personal information when it is necessary for the purpose of providing for the education of students and/or the employment of school board employees, or as required and authorized by law. This procedure outlines the process for the management, collection and disclosure of personal information within the CDSBEO.

2. Definitions

Personal Information: “personal information” means recorded information about an identifiable individual, including,

- (a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
- (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- (c) any identifying number, symbol, photo or other particular assigned to the individual,
- (d) the address, telephone number, fingerprints or blood type of the individual,
- (e) the personal opinions or views of the individual except where they relate to another individual,
- (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- (g) the views or opinions of another individual about the individual, and
- (h) the individual’s name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.



Retention (of personal information): Personal information that has been used by an institution shall be retained after use by the institution for the period prescribed by regulation in order to ensure that the individual to whom it relates has a reasonable opportunity to obtain access to the personal information (MFIPPA, R.S.O. 1990, c. M.56, s. 30 (1)). It should be noted that, in addition to the retention requirements set out in the MFIPPA regarding personal information, the *Ontario Student Record (OSR Guideline, 2000* requires specific periods of retention for the information contained in a student's Ontario Student Record. The procedures regarding OSRs are outlined in Board Administrative Procedure F2:2 – OSRs”.

3. Procedure

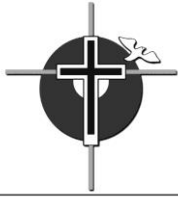
3.1 Responsibility

Under the MFIPPA, the CDSBEO is responsible for personal information under its control and may designate in writing an individual within the school board who is accountable for compliance with privacy legislation. All enquiries which fall under the MFIPPA should be directed to the Executive Assistant to the Director of Education.

3.2 Information Collection, Management and Disclosure

In compliance with the MFIPPA, the Board will:

- a) limit the collection of personal information to that which is necessary for its specified purposes in accordance with its statutory duties and responsibilities;
- b) 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;
- c) 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;
- d) retain personal information in accordance with the Board's established Records Retention Schedule (see procedure F3:1 Information and Records Management);
- e) 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;



- f) upon request, the Board shall allow an individual to access his/her personal information in accordance with privacy legislation, subject to any mandatory or discretionary exceptions.

3.3 Official Access Requests

- a) Official requests for access to information will be directed to the Executive Assistant to the Director of Education for registration, documentation and receipt acknowledgment.
- b) A copy of requests will be directed to the Director or designate, for information, and to the appropriate supervisory officer for response.
- c) All responses will be directed to the Executive Assistant to the Director of Education for review, final documentation and dispatch to the requester.
- d) Any delay in preparing a response within the 30 calendar day limit will be promptly reported to the Executive Assistant to the Director of Education to allow appropriate notice to be given to the requester.
- e) Where permissible request processing fees are estimated to exceed \$25.00, a cost estimate will be sent to the Executive Assistant to the Director of Education for appropriate action, within the 30 calendar day limit.
- f) Any processing fees collected will be credited to the department which incurred the cost.
- g) Any disagreements the interpretation and application of the provisions of the MFIPPA, or any other disagreements regarding access and privacy issues, will be submitted to the Director, or designate, for final resolution.