

BOARD POLICY

SECTION F

F2

Communications - Personal Information Management Freedom of Information and Protection of Privacy

1. Policy Statement:

The Catholic District School Board of Eastern Ontario is committed to ensuring that all personal information that is collected, used, disclosed and retained in its school system is protected in accordance with the expectations of parents, students and its employees and in compliance with its obligations under the Ontario Education Act, the Ontario Student Record Guideline (“OSR Guideline”), and the Municipal Freedom of Information and Protection of Privacy Act (“MFIPPA”).

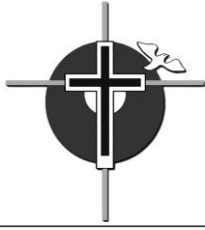
The goal of the Catholic District School Board of Eastern Ontario (“the Board”) is to ensure that its practices and procedures provide the highest level of privacy protection to personal information. In order to achieve this goal, the Board has adopted the privacy principles set out herein as the basis of its Privacy Policy. These principles have been drawn from the Privacy Standard developed by the Privacy Information Management Task Force for use by Ontario school boards. In order to provide guidance and direction on how this Policy applies to the Board and its employees, the Board has also developed administrative Procedures dealing with the protection of privacy which can be found on the Board website.

2. Definition of Personal Information:

For the purposes of this Privacy Policy, any reference to “personal information” means “personal information” as defined in MFIPPA.

MFIPPA defines “personal information” as any 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 relating to financial transactions in which the individual has been involved;
- c) any identifying number, symbol 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 if they relate to another individual;



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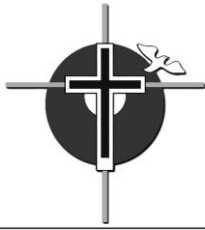
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- f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence;
- g) the view or opinions of another individual about the individual;
- h) the individual's name if 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.

3. Designation of Head

- a) The Director of Education/designate shall be considered the Head of the Board for the purposes of the Municipal Freedom of Information and Protection of Privacy Act.
- b) The Director of Education will designate an officer of the Board to be the Freedom of Information Coordinator for the purpose of the MFIPPA. The Coordinator will be responsible for the following:
 - i. receiving all requests for information under the Act;
 - ii. retrieving and reviewing Board records;
 - iii. preparing correspondence related to notification and access, including tracking of requests;
 - iv. preparing policies and procedures which support and comply with provisions under the MFIPPA;
 - v. preparing Board records for access, including severing of private information;
 - vi. preparing the Board's Annual Report to the Information and Privacy Commissioner;
 - vii. coordinating staff training related to implementation of the legislation; and
 - viii. overseeing the administration of fees and financial reporting for requests made under the Act, in cooperation with the Finance Department.
 - ix. initiating response protocol for privacy breach or suspected breach.



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4. Privacy Principles

a) Accountability and Responsibility

The Board shall designate an individual who is responsible for the management of the personal information in its custody or control. This individual shall receive and respond to all requests for information in compliance with the rules relating to access to information and privacy set out in MFIPPA.

The Board shall regularly review and, if necessary, modify its procedures and strategies in relation to privacy in order to ensure that all of its employees are fully aware of the individual's right to privacy and their role in protecting the personal information entrusted to them.

b) Limiting Collection

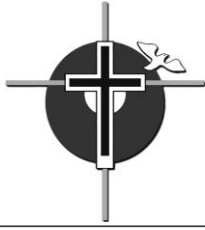
In compliance with MFIPPA, the Board shall collect personal information only if it is expressly authorized to do so by statute (such as the Education Act); or if the information is to be used for the purposes of law enforcement as defined in MFIPPA; or if the information is necessary for the Board to properly administer its educational functions and activities. The Board shall not collect personal information unless one of these three circumstances applies.

c) Consent

If the Board is authorized to collect personal information pursuant to one of the three circumstances noted in item 4. b) above, it shall, whenever possible, collect the personal information directly from the individual to whom the information relates. The Board shall collect personal information from a source other than the individual to whom it relates only if it obtains the prior consent of that individual or if it falls within certain other limited circumstances set out in MFIPPA, such as, for example, if the information is being collected for the purpose of determining suitability for an honour or award.

d) Notification of Purpose of Collection

At or before the time that personal information is collected from an individual, the Board shall inform the individual of the legal authority for the collection and of the



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principal purpose(s) for which the information is being collected, and shall provide the title, business address and business telephone number of a person who can answer the individual's questions about the collection.

e) Limiting Use and Disclosure of Personal Information

The Board shall not use or disclose the personal information in its custody for purposes other than those for which the personal information was collected, unless the Board has obtained the prior written consent of the individual to whom the information relates, or unless it is permitted to do so by law or required to do so by law.

The Education Act is the law which governs the use and disclosure of information held in a student's Ontario Student Record and the Board shall comply with its provisions in regard to the use and disclosure of that information. MFIPPA is the law which governs the Board's use and disclosure of personal information generally, including the personal information of students and of Board employees, and the Board shall comply with its provisions in regard to the use and disclosure of all personal information in the Board's custody and control.

f) Retention and Disposal of Personal Information

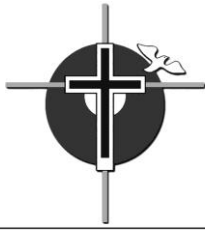
The Board shall retain the personal information it collects in accordance with regulations made under MFIPPA which provide that school boards must keep all personal information for at least one year, unless a shorter retention schedule is established by means of a Board by-law or resolution or the student or parent has consented to an earlier disposal. The Board shall also comply with the OSR Guideline which establishes minimum retention schedules for Ontario Student Records.

g) Accuracy

To the extent it is able, the Board shall ensure that personal information is accurate and complete, and is updated as is necessary for the purposes for which it is to be used.

h) Security Safeguards

The Board shall take all steps necessary to ensure that personal information is secured and protected from unauthorized access, disclosure, use, or modification or inadvertent loss or destruction.



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i) Individual Access to Personal Information

The Board shall allow an individual access to any personal information about him/her which is held by the Board in accordance with the provisions of the Education Act and MFIPPA.

An individual is entitled to challenge the accuracy and completeness of his/her personal information held by the Board and to request that it be amended or to have a letter of disagreement retained on file.

The Board shall notify an individual in accordance with the provisions of MFIPPA if any third party service provider requests his/her personal information.

j) Openness and Transparency

The Board's policies and practices relating to the management of personal information shall be made readily available to the public.

k) Compliance

If an individual feels that the Board has not lived up to the guidelines of Board Policy F2, he/she may contact the individual designated as responsible for this policy to address his/her concerns.

Date of Board Approval:

September 1, 2009; Board Motion No. 0909323

April 7, 2015; Board Motion No. 15-04-105

ADMINISTRATIVE PROCEDURES:

- A) Freedom of Information and Protection of Privacy
- B) Information and Records Management

REFERENCE: