

Number:	<i>To be determined</i>
Topic:	Privacy and Information Management
Effective:	January 2010
Cross-Reference:	<i>Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c.M.56;</i> <i>Personal Health Information Protection Act, S.O. 2004, c.3, Sched. A;</i> <i>Education Act, R.S.O. 1990, c.E.2.</i>
Review/Revision Date:	January 2013
Responsibility:	Superintendent of Education (MISA, Research); Manager FOI

INTENDED PURPOSE:

The Halton District School Board is committed to the protection of personal information under its control and to the individuals' right of privacy regarding personal information that is collected, used, disclosed, and retained in the school system.

To that end, the Halton District School Board is committed to following the direction of the Privacy Standard and the ten commitments regarding privacy protection, and what actions are taken by the organization when managing personal information:

The Privacy Standard has been developed by the Privacy Information Management taskforce for use by Ontario school boards/authorities. It is based on globally recognized fair information principles and is grounded in Ontario privacy legislation, specifically the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), the *Personal Health Information Protection Act* (PHIPA), the *Education Act* (including the *Ontario Student Record Guidelines*), and the *Personal Information and Protection of Electronic Documents Act* (PIPEDA).

In addition, this Standard attempts to meet public expectations regarding the protection of personal information. The ten commitments which make up the Privacy Standard have been adapted from the CSA Fair Information Privacy Principles. For the purpose of this Standard, personal information includes personal health information except where otherwise noted.

PRIVACY STANDARD

The Halton District School Board is committed to the following:

1. Accountability and Responsibility

Under the *Municipal Freedom of Information and Protection of Privacy Act*, the boards of trustees of Ontario school boards/authorities are responsible for personal information under their control and may designate an individual within their school board/authority who is accountable for compliance with privacy legislation.

Under the *Personal Health Information Protection Act*, health information custodians are responsible for personal health information and may designate an individual within their school board as an agent to assist with compliance with privacy legislation.

2. Specified Purposes

The purposes for which personal information is collected are specified, and individuals are notified of the purposes at or before the time personal information is collected.

3. Consent

An individual's informed consent is required for the collection, use, and disclosure of personal information, except where otherwise permitted by law.

4. Limiting Collection

The collection of personal information is fair, lawful, and limited to that which is necessary for the specified purposes.

5. Limiting Use, Retention, and Disclosure

The use, retention, and disclosure of personal information are limited to the specified purposes identified to the individual, except where otherwise permitted by law.

6. Accuracy

To the extent of its power and authority, the Halton District School Board ensures personal information is accurate, complete, and up-to-date in order to fulfill the specified purposes for its collection, use, disclosure, and retention.

7. Security Safeguards

Personal information is secured and protected from unauthorized access, disclosure, and inadvertent destruction by adhering to safeguards appropriate to the sensitivity of the information.

8. Openness and Transparency

Policies and practices relating to the management of personal information are made readily available to the public.

9. Access and Correction

An individual has the right to access his/her personal information and will be given access to that information in accordance with privacy legislation, subject to any restrictions.

An individual has the right to challenge the accuracy and completeness of the information and request that it be amended, as appropriate, or to have a letter/statement of disagreement retained on file.

Any individual to whom the disclosure has been granted in the year preceding a correction has the right to be notified of the correction/statement.

An individual is to be advised of any third party service provider requests for his/her personal information in accordance with privacy legislation.

10. Compliance

An individual may address or challenge compliance with the above principles to the designated individual(s) accountable in the Halton District School Board.