



# Administrative Procedure: Freedom of Information and Protection of Privacy

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## 1.0 Rationale

- 1.1 The Superior North Catholic District School Board only collects personal information when it is necessary for providing for the education of students and/or the employment of School Board employees, or as required and authorized by law. The School Board operates under the authority of the Education Act and its associated regulations.
- 1.2 The management of personal information collected by the School Board 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).

## 2.0 Implementation

- 2.1 The Director of Education or his/her Designate is authorized to provide the administrative guidelines necessary to implement this policy and administrative procedure.

## 3.0 Guidelines

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

## 4.0 Accountability & Responsibility

- 4.1 Under the Municipal Freedom of Information and Protection of Privacy Act, the School Board is responsible for personal information under its control and may designate in writing, an individual(s) within the Board who is accountable for compliance with privacy legislation.
- 4.2 Under the Personal Health Information Protection Act, Health Information Custodians are responsible for personal health information in their custody and control and may designate an individual within their School Board as an agent, to assist with compliance with privacy legislation.

## 5.0 Specified Purposes

- 5.1 The School Board 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.

## 6.0 Consent

- 6.1 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.

## 7.0 Limiting Collection

- 7.1 The School Board shall limit the collection of personal information to that which is necessary for its specified purposes in accordance with its statutory duties and responsibilities.

## 8.0 Limiting Use, Retention & Disclosure

- 8.1 The School Board 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 an authorized or required by law. The School Board shall retain personal information in accordance with the School Board's retention schedule.

## 9.0 Accuracy

- 9.1 The School Board 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.

## 10.0 Safeguards

- 10.1 The School Board 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.

## 11.0 Openness & Transparency

- 11.1 The School Board shall make available to the public, specific information about its policies and practices relating to the management of personal information.

## 12.0 Access & Correction

- 12.0 Upon request, the School Board 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.

## 13.0 Compliance

- 13.1 An individual shall have the ability to address or challenge compliance with these principles and in accordance with the School Board's guidelines/procedures.