
1. Rationale

The Simcoe County District School Board (SCDSB) collects personal information of staff and students to support the provision of educational services to its students. The board operates under the authority of the *Education Act* and its associated regulations.

The management of personal information collected by the board for this purpose is in accordance with the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)* and the *Personal Health Information Protection Act (PHIPPA)*. These laws ensure that public bodies are open and accountable to the public by providing a right of access to records, and to protect the privacy of individuals by controlling the manner in which public bodies collect, use and disclose personal information.

2. Policy

It is the policy of the SCDSB to collect, use and disclose personal information in the course of meeting its statutory duties and responsibilities. The board is committed to the protection of privacy and complies with all applicable regulations in the *Education Act*, the *Municipal Freedom of Information and Protection of Privacy Act* and the *Personal Health Information Protection Act, 2004* and any other applicable statute.

3. Guidelines

The protection of personal information held by the board is guided by the following principles:

3.1 Accountability and Responsibility:

Under MFIPPA, the SCDSB is responsible for personal information under its control. The Director of Education and/or designate is accountable for the organization's compliance with this law.

Under PHIPPA, 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 the Act.

3.2 Specified Purposes:

The board shall identify the purpose for which personal information is collected and individuals shall be notified of the purposes and any other information required by legislation at or before the time personal information is collected.

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- 3.3 **Consent:**
Personal information is collected for the provision of educational services to students in accordance with pertinent legislation. When required by this legislation, the knowledge and informed consent of an individual will be obtained for the collection, use and disclosure of personal information.
- 3.4 **Limiting Collection:**
The board shall limit the collection of personal information to that which is necessary for its specified purpose in accordance with its statutory duties and responsibilities.
- 3.5 **Limiting Use, Retention and Disclosure:**
The 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 as authorized or required by legislation. The board shall retain personal information in accordance with the SCDSB Records and Information Management policy and program.
- 3.6 **Accuracy:**
The board shall implement processes to ensure that personal information is accurate, complete and current in order to fulfil the specified purposes for its collection, use, disclosure, and retention.
- 3.7 **Safeguards:**
The 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.
- 3.8 **Openness and Transparency:**
The board shall make readily available to the public specific information about its policies and practices relating to the management of personal information.
- 3.9 **Access and Correction:**
Upon request, the board shall allow an individual access to their personal information in accordance with the statutes, subject to any mandatory or discretionary exemptions. An individual has the right to challenge the accuracy and completeness of their personal information and to request that it be amended as appropriate or to have a letter or statement of disagreement retained on file. An individual to whom disclosure has been granted in the year preceding a correction has the right to be notified of the correction statement. An individual will be advised of any third party service provider requests for their personal information in accordance with privacy legislation.

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- 3.10 Compliance:
An individual shall have the ability to address or challenge compliance with this policy to the Director of Education or designate.

4. Administrative Procedures

The Director of Education is authorized to provide the administrative procedures necessary to implement this policy.

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