

<b>Protection of Privacy</b>	
<b>Adopted:</b> December 15, 2015	<b>Last Reviewed/Revised:</b> December 17, 2024
<b>Next Scheduled Review:</b> 2027-2028	
<b>Associated Policies &amp; Procedures:</b> <a href="#">VI-51 Security Breach Procedure</a> <a href="#">VI-81 Privacy Procedure</a> <a href="#">VI-101 Information Security Procedure</a> <a href="#">I-02 Records and Information Management Policy</a> <a href="#">VI-82 Records and Information Management Procedure</a> <a href="#">I-30 Video Surveillance</a> <a href="#">VI-83 Video Surveillance Procedure</a> <a href="#">I-43 Use of Technology and Digital Citizenship</a> <a href="#">VI-62 Use of Technology and Digital Citizenship</a> <a href="#">VI-63 Social Media</a> <a href="#">II-38 Educational Research</a> <a href="#">VI-25 Educational Research</a> <a href="#">V-18 Community Engagement and Public Consultation Policy</a> <a href="#">I-46 Correspondence to the Board</a>	

## Purpose

To establish the framework for safeguarding personal information under HCDSB's custody or control, and ensuring it is managed in alignment with the privacy principles outlined in *VI-81 Privacy Procedure* and the technical safeguards specified in *VI-101 Information Security Procedure*. Through these measures, HCDSB meets its statutory duties while fostering accountability, transparency, and trust in all its operations.

## Application and Scope

This policy applies to all HCDSB employees, Trustees and third party service providers who collect, use, retain, and disclose personal information pertaining to students and HCDSB employees. It governs all internal and remote operations, activities, and procedures across HCDSB facilities and digital platforms, ensuring alignment with the privacy principles outlined in *VI-81 Privacy Procedure* and the technical safeguards specified in *VI-101 Information Security Procedure*.

## References

[Education Act](#)

[Municipal Freedom of Information and Protection of Privacy Act \(MFIPPA\)](#)

[Personal Health Information Protection Act \(PHIPA\)](#)

[Personal Information Protection and Electronic Documents Act \(PIPEDA\)](#)

[Ontario Student Record Guidelines – Ministry of Education](#)

## Definitions

**Personal Information** – is recorded information about an identifiable individual including personal characteristics, medical history, identifiers, contact details, biometric data, opinions, and private correspondence.

**Record** - documented evidence that supports HCDSB and school decisions, regardless of format (e.g. printed form, film, electronic, or sound recording).

## Principles

HCDSB is committed to protecting the privacy of individuals by ensuring the secure collection, use, retention, and disposal of personal information in compliance with the *Education Act*, *MFIPPA*, *PHIPA*, *PIPEDA* and any other applicable privacy legislation.

HCDSB adheres to the following 9 Privacy Principles:

1. **Accountability:** HCDSB is responsible for the personal information under its custody or control and ensures compliance with applicable privacy legislation.
2. **Identifying Purposes:** Personal information is collected for clearly identified and lawful purposes necessary for educational, administrative, or employment-related activities.
3. **Consent:** HCDSB seeks consent for the collection, use, or disclosure of personal information, except where otherwise authorized by law.
4. **Limiting Collection, Use, Disclosure and Retention:** Personal information is limited to what is necessary for the identified purposes and is collected, used, or disclosed only as authorized and disposed of when no longer needed.
5. **Accuracy:** Personal information is maintained in an accurate, complete, and up-to-date manner as necessary for its intended purposes.
6. **Safeguards:** Personal information is protected by appropriate security measures, proportional to the sensitivity of the data.
7. **Openness:** HCDSB ensures transparency by making its privacy policies and practices readily available to individuals.

8. **Individual Access and Correction:** Individuals have the right to access their personal information and request corrections where applicable.
9. **Challenging Compliance:** Individuals can challenge HCDSB's compliance with privacy principles or applicable legislation.

## Requirements

- All employees, Trustees and third parties are required to adhere to the HCDSB's Privacy Principles.

## Responsibilities

- **Director of Education**  
The Director of Education is responsible for ensuring there is a Privacy program that complies with the principles of the Municipal Freedom of Information and Protection of Privacy Act.
- **Senior Manager IT Services:**  
The Senior Manager, IT Services is responsible for ensuring IT staff follow the Security Breach Procedure and for establishing and maintaining an IT triage and escalation process.
- **Privacy Records Information Management Office:**  
Privacy Records Information Management Office is responsible for all aspects of the HCDSB's Privacy program, including policy development and maintenance, training and awareness.
- **Employees, Trustees and Third Parties:**  
All HCDSB employees, Trustees and third parties are responsible for the management and safekeeping of personal information, using digital resources securely adhering to the *VI-101 Information Security Procedure*.

APPROVED: Regular Meeting of the Board

AUTHORIZED BY: \_\_\_\_\_  
*Chair of the Board*