

CANADORE COLLEGE
CORPORATE POLICY MANUAL

TITLE: Protection of Privacy

EFFECTIVE DATE: April 19, 2022

1. SCOPE

1.1 Authority

This policy is issued under the authority of the Board of Governors.

1.2 Application

This policy applies to all Canadore College employees, students, researchers, associates and contractors who collect, review and steward data.

1.3 Definitions

1.3.1 *Personal information:* as defined by FIPPA means 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 information 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 where they relate to another individual,
- 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 views or opinions of another individual about the individual, and
- h) the individual's name where 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.

B-14 Protection of Privacy Policy

Replaces Freedom of Information and Protection of Individual Privacy Act, 1987 Policy (1989) Procedure #
Reviewed/Approved: December 18, 2007, Resolution #27-08; April 20, 2010, Res. #70-10; May 21, 2013, Res. #73-13;
May 23, 2017, Res. #59-17; April 19, 2022, Res. #37-22

- 1.3.2 *FIPPA*: refers to the Freedom of Information and Protection of Privacy Act (Ontario).
- 1.3.3 *PHIPA*: refers to the Personal Health Information Protection Act (Ontario).
- 1.3.4 *Confidential Information*: is information intended for limited distribution and not generally or publicly available. Examples could include but are not limited to: human resource records, personal health information, third party information, legally privileged information, draft records, research or teaching materials.
- 1.3.5 *Custody*: refers to the collection, use, integrity, storage, and security of the record for a legitimate business purpose.
- 1.3.6 *Data Steward*: refers to an individual who is responsible for maintaining and protecting a defined set of data. Data Stewards are identified within the roles and responsibilities of their job descriptions or as designated by an executive sponsor.

2. PURPOSE AND PRINCIPLES

2.1 The purpose of this policy is:

- to express the College's commitment to respecting privacy and protecting personal information in accordance with applicable legislation; and
- to provide guiding principles for the collection, use, disclosure and retention of personal information in the custody of the College that comply with applicable legislation.

3. POLICY

- 3.1 Canadore College is subject to the legal requirements respecting the collection, use, disclosure and retention of personal information set out in the *Freedom of Information and Protection of Privacy Act and Personal Health Information Protection Act*. All College employees, students, researchers, associates and contractors will abide by the *Freedom of Information and Protection of Privacy Act and Personal Health Information Protection Act*. When working with personal, confidential or health information, they will collect, retain in custody and disclose only when necessary to perform their assigned duties.
- 3.2 Personal information must be accessed, used and disclosed, only for the purposes(s) for which it was collected and must be kept secure at all times.
- 3.3 Personal and other confidential information access is to be limited to legally and operationally entitled individuals, programs and departments. Any request for access to a record which contains personal or other confidential information

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should be directed to the most appropriate Data Steward with consultation from the College's Privacy Officer as required.

- 3.4 Personal information must be retained and destroyed in accordance with records retention schedules established by the College or applicable legislation.

4. ROLES AND RESPONSIBILITIES

4.1 Board of Governors

The Board of Governors is responsible for the initial approval of the policy and subsequent amendments.

4.2 President

The President is responsible for the overall management and operation of the College. The President will ensure the policy is implemented and that compliance is monitored.

5. EVALUATION

This policy will be reviewed every 3 years.

Legislation and Policies:

- [Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. F.31](#)
- [Personal Health Information Protection Act, 2004, S.O. 2004, c. 3, Sched. A](#)
- [Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans](#)
- [Emergency Disclosure of Personal Information Policy](#)

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