



Limestone District School Board is committed to the protection of privacy for all students, staff, parents, trustees, volunteers, and service providers. To this end, the Board is sensitive to the nature and purpose of all personal information requested from stakeholders.

The Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and the Personal Health Information Protection Act (PHIPA) govern the conditions under which the Board and/or schools may collect, use, and disclose personal information and how individuals must be informed when the Board and/or school is collecting this information.

The purpose of collection will determine what kind of privacy notification statement is required, such as a general privacy notification statement, or a more specific statement if personal information is collected.

1. Definition

1.1. Privacy notification statements outline the responsibilities the Board and/or a school has regarding collection, use, disclosure, and retention of personal and confidential information in order to inform internal and external individuals. MFIPPA at s.28(2) states: “No person shall collect personal information on behalf of an institution unless the collection is expressly authorized by statute, used for the purposes of law enforcement or necessary to the proper administration of a lawfully authorized activity.” MFIPPA at s.29(2) states: “If personal information is collected on behalf of an institution...it shall inform the individual to whom the information relates of:

- the legal authority for the collection;
- the principal purpose or purposes for which the information is intended to be used; and
- the title, business address, and business telephone number of an officer or employee of the institution who can answer the individual’s questions about



the collection.”

1.2. In addition, this guideline recommends that, if possible, the Board or school, also include the following information:

- where/how the information will be stored;
- the retention period;
- who will use the information; and
- who will get copies of the information.

1.3. The above statements need to be included in all personal communications, including website, forms, email, or fax.

2. Guidelines

2.1. The following guidelines have been developed to assist Board employees who are requesting the collection of personal information in order to ensure appropriate notification is provided.

2.2. Privacy notification statements must be inserted at the point at which an individual is asked to provide personal information.

2.2. A website privacy notification statement should help users understand what information is being collected about them and how it is to be used. Moreover, the privacy notification statement should reflect the Board’s and/or school’s actual organizational practices and how the website is operated technically.

2.3. Privacy notification statements must be used whenever personal information about an identifiable individual is collected. The notification must be made to everyone from whom data is collected.

2.4. The Board and/or school may use personal information only to the extent necessary to enable the Board and/or school to carry out the activity for which the data was



collected in a reasonable manner.

- 2.5. Privacy notification statements should be printed on every collection form, whether paper or electronic, and on a separate or covering document that is a guide to the completion of the form, if applicable.
- 2.6. Privacy notification statements should be easily identifiable and clearly articulated.
- 2.7. The design of forms should place the privacy notification statement either at the top of the form (before any personal information is collected) or at the bottom of the form just above the signature line.
- 2.8. Personal information must be retained for a minimum of one year following the use of the information. If it is retained longer to satisfy the records retention period, then the longer period of the two must be stated on the form.
- 2.9. The development of privacy notification statements will include expertise from Information Technology Services, the Board's Freedom of Information/Protection of Privacy Coordinator, and staff from the program area, as appropriate. Together such expertise will ensure that:
 - Practices comply with the MFIPPA and/or PHIPA.
 - Program needs are met, and IT processes are understood.

3. Developing a Website Privacy Notification Statement

- 3.1. Before developing a privacy notification statement for a Board or school website, consideration must first be given with respect to how the website is used, such as broadcasting static information, providing customized entry points, and/or conducting functions that collect personal information.
- 3.2. Websites change constantly with respect to new content and function and as such, privacy notification statements should be reviewed regularly to ensure that they are accurate and appropriate to the circumstances.



- 3.3. A link to the privacy notification statement should be provided from every page of the website.
- 3.4. As Board and/or school stakeholders are knowledgeable about privacy issues, consideration should be given to displaying the privacy notification statement on the home page.
- 3.5. If users can conduct transactions on the site (for example, filling out a form or application), a link should be provided to the general privacy notification statement for the website. As well, a specific privacy notification statement should be created regarding the use and authority for the information to be collected on the form, just as it would on paper-based transactions with stakeholders.
- 3.6. A good website privacy notification statement contains multiple parts, each of which addresses specific concerns of users or specific aspects of personal information that may be collected depending on how the website is built and operated and how the users use the site. See Appendix A for details.

4. General Website Privacy Statements

- 4.1. Websites provide a first impression of the Board or school. A clearly presented general policy on privacy can reassure users that the information collected will be handled appropriately. General privacy notification statements are appropriate for sites that only post information—where users are browsing, searching, and downloading information from the site. General privacy notification statements should be written in plain language and tell users what, if any, information is collected when they visit the site. If the site does not use cookies or other tools for collecting user information, it is wise to state this in the general privacy notification statement.

5. Privacy and Links to Other Websites

- 5.1. One of the advantages of the Web is the ability to link to other information. Almost all Board websites have links to other organization, agency and/or government sites



as well as non-government sites. In these cases, the privacy notification statement should contain a notice to the user accesses another site from a Board website, the privacy policy of that site may be different.

6. Information Collected in Emails and Web Forms

- 6.1. Most Board websites allow the user to email an employee of the department/school. Many sites also have forms that users can fill out to receive further information, apply to programs, become part of a mailing list or listserv, or join a discussion group. Because the majority of these instances involve the collection of personal information, the privacy notification statement should clearly state how this information is to be used, if and how it will be retained, and to whom (and in what form) it may be disclosed.
- 6.2. It is also good practice to warn the person that, while the information submitted will be protected once it reaches your site, the Internet is not totally secure and that you cannot ensure that the information will be protected during transmission to your site.

7. Conclusion

- 7.1. Privacy notification statements ensure employees are aware of their responsibilities regarding the collection, use, disclosure, and retention of personal and confidential information. In addition, privacy notification statements assure both internal and external stakeholders that the personal and confidential information they provide to Limestone District School Board will be handled appropriately.

Legal References

Municipal Freedom of Information & Protection of Privacy Act
Personal Health Information Protection Act
Education Act