



PERSONNEL

EMC Reviewed: November 5, 2013
Policy Council Review: First Reading
EMC Reviewed: Second Reading: November 19, 2013
Board Approved December 10, 2013: BM # 14:2013-2014

NAME: STAFF-STUDENT PRIVACY

PHILOSOPHY:

Great Plains College is committed to the appropriate use, handling, retention and disposal of the personal information of its employees and prospective, current and past students.

PURPOSE:

Great Plains College is a "Local Authority" pursuant to The Local Authority Freedom of Information and Protection of Privacy Act (LAFOIP). As such, it is responsible to protect the personal information it acquires in the course of its business operations, to provide appropriate access to records in its possession, and to ensure that not only its own staff but also third party contractors it works with comply with this policy, LAFOIP, and any other relevant privacy legislation.

POLICY:

DEFINITIONS

Personal Information in the context of the college environment will include information about an identifiable individual that is recorded in any form as defined in Part IV, Section 23 of LAFOIP. Typically this will include but not be limited to items such as:

- Name and mailing information
- Social Insurance Number
- Citizenship status and/or Place of Origin
- Gender
- Marital and/or Family Status
- Birth date
- Health Services Number
- Personal health information
- Disability
- Age
- Information disclosed by an individual in order to identify with an equity group
- Emergency Contact Information
- E-mail address and account information
- Employment history information
- Education history information (including attendance in current programs)
- Criminal history information
- Financial information
- Views and opinions of another individual with respect to the individual
- Information gathered for the purpose of collecting a tax

ROLES:

The College shall appoint a Privacy Head whose responsibilities include:

- a) Responsibility for implementation and interpretation of this policy.

PERSONNEL

- b) Ensuring, in conjunction with Human Resources, that appropriate orientation and education on Privacy policy and processes is provided to staff.
- c) Receiving requests to access college records directly or upon referral from other staff.
- d) Overseeing practices to ensure consistency with this policy and the Act.
- e) Investigating any complaints about unauthorized disclosure of personal information.

The Privacy Head will make a decision concerning an access request and communicate the College's decision in writing to the person making the request.

PROTECTION OF PERSONAL INFORMATION

Personal information shall not be used or disclosed except for the specific purpose for which it is collected. Subject to the Act, individuals are entitled to access their own personal information and to request correction of the personal information where the individual believes there is an error or omission.

Purpose – Great Plains College will identify the purposes for which personal information is being collected at or before the time the information is collected.

Consent – Great Plains College will collect personal information with consent; in some cases this consent will be reasonably implied. Where an individual uses a Great Plains College website to provide personal information, consent will be inferred and browser, IP address and website usage information may be collected.

Retention- Great Plains College will retain personal information as long as needed to fulfill the purpose for which it was collected and for as long as required to comply with the most current Administrative Records Management System issued by the Saskatchewan Archives Board. Refer to the Great Plains College Document Retention and Disposal Policy for more information.

ACCESS GUIDELINES

The personal information of prospective, current and past students and employees will be protected and access limited, where within the control of the college, to Great Plains College staff requiring the information as part of provision of normal services, to a limited set of third parties who work with the college to provide services and programs, and to those who make proper access requests and are entitled to the information per the Act.

Subject to the Act, individuals are entitled to access their own personal information upon a written request and to request correction of the personal information where the individual believes there is an error or omission.

Upon written request, students may request that copies of their student record be forwarded to themselves or to an identified third party. Where the record kept by Great Plains College is not the student's official record (ie: transcript information housed at brokering institutions), students will be advised to contact the brokering institution for an official record.

Third party access request may be granted in appropriate cases. The affected student or employee will be advised if his/her information has been requested and cannot be "de-identified" to comply with the request to give him/her an opportunity to object. Access to information may be declined or granted on a restricted basis if Great Plains College determines that any provision contained within the Act is

PERSONNEL

applicable. Great Plains College will advise the applicant of its decision to withhold some or all of the requested information and the applicant may seek a review of Great Plains College's decision first with the Manager of HR, CEO and lastly via the Saskatchewan Information and Privacy Commissioner.

Access requests can be filed following the process described in the Great Plains College Freedom of Information Guidelines.

Great Plains College may release information where a case of authorized, justified or legally required release is established. These may include:

- Release of personal information in response to a Court Order or formal legal or public investigation
- Release information to appropriate emergency contacts in the event of an emergency or a safety or security threat to any individual
- Release of select information to government departments for the purposes of statistical analysis and research, ensuring that the information's confidentiality is protected to the fullest extent possible
- Release in other situations that are specifically permitted by LAFOIP.
- Release to a limited number of third party partners who provide services related to the delivery of Great Plains College programs and services
- Release in order to collect a debt owing to Great Plains College.

REFERENCES:

The Local Authority Freedom of Information and Protection of Privacy Act (LAFOIP)
Great Plains College Document Retention and Disposal Policy
Great Plains College Information Security and Information Technology Acceptable Usage Policy
Great Plains College Internet and E-mail Usage Policy
Great Plains College Freedom of Information Guidelines/Access Request Form
Great Plains College Consent to Disclose Personal Information Form

CONTACT:

Great Plains College's Privacy Officer

E: privacyofficer@greatplainscollege.ca
P: 306-773-1531

ADDITIONAL RESOURCES:

Office of the Saskatchewan Information and Privacy Commissioner
503-1801 Hamilton St
Regina, SK S4P 4B4
1-877-748-2298 Toll free or 1-306-787-8350
E: webmaster@oipc.sk.ca
W: <http://www.oipc.sk.ca/default.htm>