



# OntarioLearn Policy

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<b>POLICY TYPE:</b>	Corporate
<b>POLICY TITLE:</b>	Confidentiality of Student Information Policy
<b>POLICY NO.:</b>	CORP-009
<b>RESPONSIBILITY:</b>	OntarioLearn Policy Committee
<b>POLICY APPROVED BY:</b>	OntarioLearn Board of Directors
<b>EFFECTIVE DATE:</b>	April 2015
<b>REVISED:</b>	April 2015
<b>REVIEW DATE:</b>	April 2019

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## Introduction

OntarioLearn strongly believes in respecting privacy and protecting personal information in accordance with applicable legislation.

## Purpose

The purpose of this policy is to provide a framework to assist host/registering colleges and OntarioLearn in managing student information that is in their custody to support of the delivery of online courses and to ensure compliance with the Freedom of Information and Protection of Privacy Act (FIPPA).

## Definitions

**Host college:** The College who owns/delivers the course.

**Privacy breach** refers to an unauthorized collection, use or disclosure of someone's personal information, in contravention of the Freedom of Information and Protection of Privacy Act.

**Record** refers to the collection of information submitted in support of a student's enrollment in a course available through OntarioLearn.

**Registering college:** The College where the student is registered.

## Policy statements

1. All partner colleges and OntarioLearn are 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.
2. Personal information must be used and disclosed only for the purposes(s) for which it was collected and must be kept secure at all times. Personal information may be disclosed to staff at OntarioLearn, host/registering college, and/or contracted service providers only on a "need to know" basis where they require the information to perform their assigned duties and responsibilities.
3. OntarioLearn refers all requests for personal information that are not directly related to the delivery of services to the registering college.

4. Contract agreements with third-party organizations/service providers must address security, privacy, retention, deletion and backup procedures related to the handling of student information.
5. OntarioLearn coordinates the removal of student information with service providers once it is no longer needed to support the delivery of its online courses in accordance with intake schedules.
6. In the event of a suspected or confirmed privacy breach, OntarioLearn will immediately report the incident to the affected host/registering college and actively participate in the investigation, assessment and resolution. OntarioLearn will also inform the Information and Privacy Commissioner of Ontario of the breach.

### **Accessibility for Ontarians with Disabilities Act (AODA) considerations**

OntarioLearn's commitment to accessibility and AODA standards has been considered in the development of this policy.

### **Roles and responsibilities**

OntarioLearn have a responsibility to maintain personal information in a secure manner.

It is the responsibility of a partner college to immediately report any suspected or confirmed privacy breach to OntarioLearn.

It is the responsibility of OntarioLearn to immediately report any suspected or confirmed privacy breach to the affected host/registering college.

### **Non-compliance implications**

Non-compliance could result in the inability to act in accordance to Freedom of Information and Protection of Privacy Act, which could result in fines against OntarioLearn and/or partner colleges. Non-compliance may have a negative impact on the reputation of OntarioLearn and partner colleges.

### **Related policies, procedures and directives**

Freedom of Information and Protection of Privacy Act

[http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_90f31\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90f31_e.htm)

Partner College Confidentiality and Information/Privacy policies