

Privacy & Information Management

Board Policy

Policy Adopted: December 2009 (M09-0276)
Revision Date: October 2025
Responsibility: Superintendent of Information Services

1. Objective

The objective of this policy is to establish a framework for the responsible collection, use, retention, disclosure and disposal of personal and confidential information within the Halton District School Board (HDSB). This policy ensures compliance with applicable legislation, including the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), the Personal Health Information Protection Act (PHIPA), and the Education Act while promoting a culture of privacy, security, and transparency.

Specifically, this policy aims to:

- 1. Protect Personal Information** – Safeguard student, staff, and stakeholder information against unauthorized access, use or disclosure.
- 2. Ensure Legal Compliance** – Align board practices with privacy laws and regulations to uphold individuals' rights.
- 3. Promote Responsible Information Management** – Establish clear guidelines for handling and securing data across all school board operations.
- 4. Support Transparency and Accountability** – Foster trust by ensuring that information practices are communicated clearly and that privacy obligations are met.
- 5. Encourage Privacy Awareness** – Educate staff, students, and families about their roles and responsibilities in protecting personal information.

2. Policy Statement

The Halton District School Board is committed to the protection of personal information within its custody and control and to the individuals' right of privacy regarding personal information that is collected, used, disclosed, generated, retained and disposed of in the school system.

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To that end, the Halton District School Board is committed to adhering to the principles articulated in the Privacy Information Management (PIM) Toolkit Privacy Standard as well as Canadian Standards Association (CSA) Model Code for the Protection of Personal Information and the requirements of relevant Ontario law. The PIM Privacy Standard was developed by the PIM Taskforce for use by Ontario school boards/authorities. It is based on globally recognized fair information principles, including the CSA Model Code.

In addition, this Standard attempts to meet public expectations regarding the protection of personal information. For the purpose of this Standard, personal information includes personal health information except where otherwise noted.

3. Scope

This policy applies to all HDSB departments, schools, staff, trustees, volunteers, students, visitors, vendors, contractors, and other third-party individuals and organizations that have been authorized by the HDSB to have access to HDSB resources, including but limited to data and infrastructure.

The requirements of this policy also apply in situations where information is created, processed, transmitted, or stored by contracted third party service delivery partners and their subcontractors including but not limited to metadata and customer-derived data.

4. Guiding Principles

The Halton District School Board is committed to the following:

1. Accountability and Responsibility

Under MFIPPA, the boards of trustees of Ontario school boards/authorities are responsible for personal information under their control and may designate an individual within their school board/authority who is accountable for compliance with privacy legislation. In the HDSB, this authority has been delegated to the Director of Education.

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Under the Personal Health Information Protection Act, the HDSB operates as a Health Information Custodian (HIC) and is therefore responsible for personal health information and may designate an individual within the HDSB as an agent to assist with compliance with privacy legislation.

2. Specified Purposes

The purposes for which personal information is collected are specified, and individuals are notified of the purposes at or before the time personal information is collected.

3. Consent

An individual's informed consent is required for the collection, use, and disclosure of personal information, except where otherwise permitted by law.

4. Limiting Collection

The collection of personal information is fair, lawful, and limited to that which is necessary for the specified purposes.

5. Limiting Use, Retention and Disclosure

The use, retention, and disclosure of personal information are limited to the specified purposes identified to the individual, except where otherwise permitted by law.

6. Accuracy

To the extent of its power and authority, the Halton District School Board ensures personal information is accurate, complete, and up-to-date in order to fulfill the specified purposes for its collection, use, disclosure, and retention.

7. Security Safeguards

Personal information is secured and protected from unauthorized access, disclosure, and inadvertent destruction by adhering to safeguards appropriate to the sensitivity of the information.

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8. Openness and Transparency

Policies and practices relating to the management of personal information are made readily available to the public.

9. Access and Correction

An individual has the right to access their personal information and will be given access to that information in accordance with privacy legislation, subject to any restrictions.

An individual has the right to challenge the accuracy and completeness of the information and request that it be amended, as appropriate or to have a letter/statement of disagreement retained on file.

Any individual to whom the disclosure has been granted in the year preceding a correction has the right to be notified of the correction/statement.

An individual is to be advised of any third party service provider requests for his/her personal information in accordance with privacy legislation.

10. Compliance

An individual may address or challenge compliance with the above principles by contacting the Manager - Access, Privacy and Records and/or the Superintendent of Information Services at privacy@hdsb.ca.

5. Definitions

MFIPPA - refers to the Municipal Freedom of Information and Protection of Privacy Act under which school boards in Ontario operate.

Health Information Custodian (HIC) - refers to a person or organization listed in PHIPA that has custody or control of personal health information. The HDSB operates as a HIC with respect to personal health information.

PHIPA - refers to the Personal Health Information Protection Act which establishes rules for the collection, use and disclosure of personal health information about individuals.

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Related Board Policies and Governance Procedures

Cyber Security and Data Protection Policy

Risk Management Policy

Related Board Administrative Procedures

Board Assigned Mobile Cellular Device Administrative Procedure

Cyber Security and Data Protection Administrative Procedure

Electronic Monitoring Administrative Procedure

Privacy Breach Protocol Administrative Procedure

Records Management Administrative Procedure

Responsible Use of Information and Communication Technology (ICT) Administrative Procedure

Risk Management Administrative Procedure

School, Staff, and Student Websites Administrative Procedure

Social Media and Electronic Communications for Staff Administrative Procedure

Related Legislation and Industry Documents

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c.M.56

Personal Health Information Protection Act, S.O. 2004, c.3, Sched. A

Education Act, R.S.O. 1990, c.E.2.

Policy Due for Review: October 2029

Revision History

- October 2025, M25-089 - Comprehensive Review
 - Clarified language, updated definitions and references
- January 2021
- 2013