



| | | Yes | No | N/A | Don't Know |
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| Commitment 1: Accountability and Responsibility | | | | | |
| P1-1 | Is there a person designated who is accountable for privacy protection and compliance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P1-2 | Are there clearly defined responsibilities and accountabilities for safeguards to protect personal information? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P1-3 | Is there a written policy or statement of information practices? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P1-4 | Have privacy policies or procedures been developed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P1-5 | Is there a process in place to regularly review privacy policies and procedures? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P1-6 | Does a reporting process exist to ensure that senior management is informed of any privacy compliance concerns? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P1-7a | Is personal student or staff information collected, used, or disclosed to third party partners in carrying out programs or services on behalf of the school board/authority? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P1-7b | If yes, are provisions in place to ensure that the third party meets the school board's/authority's privacy protection requirements (e.g., software vendor agreements, purchasing agreements, data sharing agreements)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Commitment 2: Specified Purposes | | | | | |
| P2-1 | Has the purpose for collecting personal information been identified in relation to the program's functional and operational requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P2-2 | Does the notice of collection identify ALL of the following: <ul style="list-style-type: none"> • a description of the personal information to be collected? • the legal authority for its collection? • the principal purpose(s) for which it is collected? • the name, position, address and telephone number of a contact person? MFIPPA 29(2) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P2-3 | If there are secondary purposes that are not included in the notice of collection, have these been documented elsewhere, such as in the Directory of Records, or attached to the record (e.g., audit trail information, OnSIS transaction validation, professional development materials, financial settlements)? MFIPPA 25 (1)b, 34 (1) a-g, 35 (1) a, b | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |



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| P2-4 | Is client notification sent for secondary uses of personal information, such as longitudinal tracking, service monitoring, and program evaluation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P2-5 | Do all forms, pamphlets, websites, and information collection and disclosure instruments clearly state the purpose(s) for the collection, use, and disclosure of personal information? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P2-6 | Is the notice of collection available to all persons affected, regardless of the medium or service channel they use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P2-7 | Are there procedures to periodically review the purposes for personal information collected? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Commitment 3: Consent | | | | | |
| P3-1 | Is there a requirement that an individual's consent be obtained before or at the time personal information about the individual is collected and before any new use or new disclosure of the information, or is notice sufficient? MFIPPA 29(1), 31a-c, 32 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P3-2 | Where consent is necessary (e.g., for indirect collection), are individuals informed of the consequences for not providing consent? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P3-3 | Are individuals advised that they can alter or withdraw consent (where permitted) after it is granted? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P3-4a | Has the purpose for collecting personal information been identified in relation to the program's functional and operational requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P3-4a | Does the project envision possible secondary uses for the personal information collected? MFIPPA 31 a, b, c | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P3-4b | If yes, does the authority for those uses flow from the initial notice of collection (i.e., is it for a consistent purpose), or is the use by an officer, employee, agent, or consultant of the board who need the information in the performance of his/her duties where use is necessary and proper to the discharge of board functions (e.g., effective educational program planning, appropriate resource allocation, advocacy for resources, funding from external partners to support students) or some other authority (e.g., disclosure to law enforcement agency for a criminal investigation)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P3-5 | Are individuals informed that they are allowed to restrict or limit the disclosure of their personal information where appropriate and feasible? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |



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| Commitment 4: Limiting Collection | | | | | |
| P4-1 | Is the collection of personal information limited to that which is needed for the identified purpose(s)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P4-2 | Is the collection of personal information: <ul style="list-style-type: none"> • authorized by statute? • necessary for the proper administration of a lawfully authorized activity? MFIPPA 28(2) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P4-3 | Is personal information collected directly from the individual? MFIPPA 29(1), 31 a-c, 32 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Commitment 5: Limiting Use, Retention, and Disclosure | | | | | |
| P5-1 | Is personal information used only for the stated purposes or for uses that are consistent with those purposes? If not, are other uses permitted by law? MFIPPA 31(b) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P5-2 | Has the unnecessary linkage of personal information across multiple databases been avoided? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P5-3 | If no, is that linkage performed only with internal identifiers instead of widely used identifiers such as the OEN, MEN or social insurance number? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P5-4 | Is there a timetable for retaining and disposing of personal information? Have any minimum and/or maximum retention periods been considered? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P5-5 | When personal information is no longer required for the identified purpose(s), or it is no longer required by law, is it destroyed, erased, or depersonalized? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Commitment 6: Accuracy | | | | | |
| P6-1 | Do personal information files: <ul style="list-style-type: none"> • record the date when the information was obtained or updated? • specify when and how the information is to be updated and the source for the update? • indicate how to verify the accuracy and completeness of information disclosed to or received from a third party? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P6-2 | Is there a procedure to provide notices of correction to third parties to whom personal information has been disclosed? MFIPPA 36(2)(c) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P6-3 | Are there records kept regarding requests for a review for accuracy, corrections, or decisions not to correct? MFIPPA 30(2) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |



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| P6-4 | If the individual and the school board representative cannot reach agreement regarding the accuracy of the record(s), is the individual advised of his or her right to file a statement of disagreement? MFIPPA 36(2)(b) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P6-5 | Does the custodian of the record note the statement of disagreement on the record(s) in such a manner as to ensure that subsequent users who access the record(s) through any service channel are aware that the accuracy of the record(s) is disputed? MFIPPA 36(2)(b) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P6-6 | Are there periodic reviews to check the accuracy of personal information records and to correct them as necessary to minimize the use of inappropriate data for decision making? MFIPPA 36(2)(b) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Commitment 7: Security Safeguards | | | | | |
| P7-1 | Do written security policies and procedures exist to protect the privacy, integrity, and availability of personal information, or will they exist before the project is completed? MFIPPA 34(1)(g) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-2 | Are staff or agents with access to personal information provided with privacy training? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-3 | Are procedures in place to revoke access privileges and recover security tokens and keys when employment is terminated or when job functions change (e.g., through transfer or promotion)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-4 | Are procedures in place to address incident reporting and investigation procedures? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-5 | Are policies and procedures in place to handle privacy breaches, including the notification of individuals when the security or privacy of personal health information has been breached, if required? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-6 | Are there controls in place over the process to grant authorization to add, change, or delete information from records? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-7 | Is the system designed so that access and changes to personal information can be audited by date and by user identification? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-8 | Do contracts with business partners specify privacy and security requirements and expectations with respect to personal information? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-9 | Are there processes in place to confirm that business partners are complying with privacy and security requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |



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| P7-10 | Is sensitive information labelled, transmitted, and stored in accordance with existing information security and privacy policies and procedures? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-11 | Are policies and procedures in place for archiving of data, e-mail, and both hard copy and electronic documents? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-12 | Is personal information disposed of under secure conditions? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-13 | Are security measures in place for the disposal of equipment such as computers, diskettes, and filing cabinets that may have personal information stored within them? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-14 | Are disaster recovery and business continuity plans in place for all mission-critical organizational processes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P7-15 | Has a threat-risk assessment been completed in conjunction with the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Commitment 8: Openness and Transparency | | | | | |
| P8-1a | Have written policies and procedures regarding the management of personal information been developed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P8-1b | If yes, have they been communicated to staff, parents and students? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P8-2 | Is the privacy policy prominently displayed on the school board/ authority website? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P8-3 | Are personal information policies and procedures clearly explained on documents used to collect personal information? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P8-4 | Do privacy policies and procedures explain how to: <ul style="list-style-type: none"> • access personal information? • correct personal information? • make an inquiry or complaint? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Commitment 9: Access and Correction | | | | | |
| P9-1 | Are there policies and procedures for responding to access requests? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P9-2 | Does the individual have access to his or her records of personal information and records related to requests for review or correction? MFIPPA 36(1), 36(2)a | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |



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| P9-3 | Are there procedures in place: <ul style="list-style-type: none"> to verify the identity of individuals requesting access to their information? to facilitate a response to requests for personal information including those in alternate formats, such as Braille or audio tapes? for correcting personal information if the individual requests, or annotating the information if a correction is not made? to enable third parties that have received personal information for which a correction is requested to be notified? MFIPPA 36(2)(c) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P9-4 | When access is limited or denied, are individuals advised in writing of the reasons for refusal and of any recourse available? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Commitment 10: Compliance | | | | | |
| P10-1 | Can an individual easily find out how to file a privacy complaint related to the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P10-2 | If a complaint is justified, is inaccurate personal information corrected and policies and procedures amended accordingly? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P10-3 | Are individuals informed that a statement of disagreement can be included with their personal information when an amendment to their information is not allowed? MFIPPA 36(2)a | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P10-4 | Are individuals advised of their right, where applicable, to complain to the Information and Privacy Commissioner? MFIPPA 39(1) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |