



POLICY AND PROCEDURE MANUAL

POLICY 16 – Privacy and Personal Information Policy

Policy Intent

This policy is intended to follow the Personal Information Protection and Electronic Documents Act (PIPEDA) and to inform students, staff and any other person(s), for which information is required, of their right to privacy when submitting information to the Humber Students' Federation (HSF) or for information that the HSF will gather from other sources, (i.e. Humber ITAL, University of Guelph-Humber), that will be used to provide services to students.

Guidelines

Accountability

The HSF, as a whole, is committed to accountability and maintaining responsibility for all of our information and our processes in collecting information that it uses for purposes of providing services. Everything the HSF does will be compliant with any and all legislation that the federal and/or provincial governments set out. In doing so we have named two officers within the organization that will take on the duties for fulfilling our requirements and maintaining accountability within the organization. These two officers are the Executive Director and the Vice President Administration of the students' respective campus location.

Identifying Purposes

As previously stated in this document, the HSF only uses information required to accurately administer the services that it provides to our members. Services such as, but not limited to, our health and dental plans, graduation photos, and bursaries as well as activities including, but not limited to, all election purposes, events and activities.

Consent

All information that is required, and that the HSF doesn't currently possess, will be collected as required. When completing information forms a disclaimer for what that information will be used for is going to be located at the bottom of each form. The submission and/or signing of such a sheet indicating the member's' agreement with the use for the information used is implicit.

Any information that the HSF is issued by Humber ITAL, or the University of Guelph-Humber has already been accepted and agreed upon when the students pay their tuition and other fees.

Limiting Collection

The HSF assures all students that we will not collect more information than is required to perform the service(s) at hand and that the information that is collected, or has been distributed to us by the College or the University, will not leave the possession of the HSF unless it is needed by the outsourced service. In this case that would be the only third party that would be entitled to students' private information, but the outsourced company must maintain a certain level of security regarding the information.

Limiting Use, Disclosure, and Retention

Following the guidelines as above, the HSF will not use any information, that we have personally collected or has been distributed to us by the College or the University, for any other use than what we said it was for. We will not sell any of the information to any third party or give it away for any reason whatsoever.

Upon the completion of the need for such information, the use will be ceased and the documents will be destroyed. All private documents within the HSF are always shredded and disposed of accordingly.

Accuracy

The HSF prides itself of keeping very accurate records, not only for the implementation of services, but in all aspects of our business activity. Any student can request access to their information at anytime and, providing viable evidence, can have their records updated and changed, if there is a need for continued use of that information.

Safeguards

All information that the HSF gathers for the purposes of providing services to students will be kept in a safe and secure location. Our offices are secured by a security alarm system that is activated every night. No one that doesn't need to have access to any information within the HSF will be granted access to it.

If information that the HSF has in its possession requires a level of security that isn't already implemented within the HSF, then the HSF will invest in an appropriate security measure to protect such information.

Openness

HSF will constantly strive for transparency in everything that we do. All our policies and our Constitution are easily accessible at any time. Members should come to the HSF office, either at the North, Lakeshore or Orangeville campus, and request a copy of the desired information from the Customer Service Representative. All policies and the Constitution are also posted on our website for downloading. If any student needs clarification with anything in those documents, that student should make an appointment with the Vice President Administration of the respected campus for clarification.

Individual Access

By law, all students of Humber ITAL, University of Guelph-Humber have the right to request their information shown to them. No student will ever be denied access to their personal information held within the HSF. If for some reason the information that we possess is inaccurate, the student can apply to have their information corrected. This can only be done once the inaccuracy has been proven and the need to change such information is required. The student that wishes to have their information changed must make an appointment with either the Executive Director or the Vice President Administration of the campus. At such time the two parties (student and HSF representative) will meet and discuss the inaccuracy and come to a conclusion on whether or not to correct the deficiency or offer an explanation as to why it will not be changed. No unreasonable request to change information will be denied.

Challenging Compliance

All individuals have the right to challenge the compliance of the HSF in regards to privacy issues and policy. If there are any issues with the way the HSF is dealing with privacy, any individual has the right to challenge the inaccuracy. The member challenging the compliance of the HSF must make an appointment with the Vice President Administration, of the campus, to discuss the matter in preliminary meeting. At this meeting the Vice President Administration will attempt to resolve the issue. If the problem goes unsolved then the Vice President Administration will bring in the Executive Director to assist with the matter. Together the group, comprising of the student(s) and the Executive Director and Vice President Administration will communicate some form of resolution and make appropriate changes to the way the HSF deals with privacy issues.