
 STUDENT HOUSING SERVICES	Policy No: 013-89-6.0	Approved on : Feb. 12, 2016 Cancels: 2006
	Signature/Position:  Director, Student Housing Services Distribution: Public	
Title: <p style="text-align: center;">PRIVACY AND COMMUNICATION OF INFORMATION POLICY</p>		
Preamble: Student Housing Services collects and shares information under the authority of the University of Guelph Act (1964), and in accordance with the <i>Freedom of Information and Protection of Privacy Act</i> (FIPPA) for the administration of its programs and services. This policy is intended to provide guidance and information related to the collection, use, storage, dissemination and disposition of personal information in order to provide facilities and services to those who use, visit or reside in our residences. This policy is affiliated with the following policies and legislation: <i>Freedom of Information and Protection of Privacy Act</i> (FIPPA), <i>Personal Information Protection of Electronic Documents Act</i> (PIPEDA), <i>Personal Health Information Protection Act</i> (PHIPA), <i>Mental Health Act</i> , <i>University of Guelph Privacy Policy</i> , <i>University of Guelph Record Retention and Disposition Policy</i> and <i>Student Housing Services Record Retention and Disposition Policy</i> .		

Disclaimer: If there is a discrepancy between this electronic policy and the written copy held by the Policy Owner prevails

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1.0 Scope:

This policy extends to individuals (including but not limited to students, staff, families) who reside in or use facilities and residences which are operated by Student Housing Services.

2.0 Definitions:

2.1 Personal Information: under FIPPA, personal information is defined as “recorded information about an identifiable individual”.

Information that is not public or contact information as defined below and can identify an individual is considered to be personal information. Examples of personal information include: student ID, employee number, date of birth, etc...

2.2 Contact Information: is defined as information that enables University personnel to contact students about university related matters (examples include email address, residence extension). The University’s primary method of communication is email. This information is considered personal unless made public by the University. Contact information is also considered to be information that enables an individual at a place of business to be contacted. Examples include staff member name, work email, position and title. Students can declare their contact information confidential through the University.

2.3 Internal Use: this is use of personal information by other University of Guelph employees or service providers. Generally this is defined as a “need-to-know” basis. “Need –to-know” basis is information that is required by an individual in order to fulfill their job duties and functions. Examples of internal use may include but not limited to, Campus Community Police, Student Financial Services, Student Accessibility Services. Please refer to section 4.0 for addition information.

2.4 External Disclosure: this is disclosure of personal information to someone who is not affiliated with the University of Guelph. This disclosure is tightly restricted by law and typically requires written consent of the individual or approval from the Director Student Housing Services. Examples may include: parent or guardian, hospital emergency personnel, and Police personnel. Extent of external disclosure may also be outlined through a *Notice of Collection*.

2.5 Notice of Collection: A statement that provides an individual to whom the personal information relates to with the following information: the legal authority for the collection, the principle purpose for which the personal information is intended to be used, and an organizational contact who can answer further questions about the collection.

3.0 Collection of Personal Information

Personal information is collected and provided to Student Housing Services through a) the University’s student information system, b) collected via online systems c) applications as well as through d) provision of services and programs. Examples of collected information may include: financial information, academic status, medical information for the purpose of accommodation etc..

4.0 Uses and Disclosures

Student Housing Services, Personal information that is collected may be used for the purposes of providing a) departmental service (e.g. allocation of residence assignments, financial transactions, accommodating special needs/requests, communication of information), b) operational need (e.g. damage billing, community management, individual conduct and behaviour, safety and security of residents and respective residence communities and for c) research or program/service evaluation.

4.1 Information used for research purposes

Personal information that is collected in the course of program or service evaluation shall be used to determine the representativeness of the evaluation. Reports derived from data collected for this purpose will not be used to attempt to identify individuals except in the case of a violation of another law (e.g. in the case of threats to specified individuals or groups). In all cases, individuals will be notified of the research's purpose and use.

4.2 Disclosure for Health and Safety

Paramount consideration will be for the health and safety of individuals and/or residence communities in regards to the disclosure of personal information. SHS may have a obligation (ie. at request of Police or emergency personnel, in regards to the Mental Health Act) to disclose personal information when there is risk of significant harm to oneself or others, property or institutional loss. Information may be internally used or externally disclosed depending on the nature of the situation. For circumstances where disclosure is being considered, the benefit of disclosing information must outweigh the breach of privacy of the individual.

5.0 Storage

Personal information shall be held as long as is reasonably necessary to fulfill a business or service requirement or as required by law after which it will be disposed (i.e. shredded, deleted etc..) of in the legally recommended secure manner and in accordance with standard operating procedures of the University and Student Housing Services. Personal information collected by SHS is typically destroyed after four (4) years.

6.0 Security and Protection

Student Housing Services takes the protection of personal information seriously and safeguards are taken to secure and protect personal information. These measures include but are not limited to encryption, secure offices and cabinets, review of procedures, safeguards on software and hardware. These measures will be in accordance with SHS security and protection standard operating procedures.

In the event of a breach (i.e theft, hacking), SHS will respond in accordance with the University Privacy Policy. Actions may include but not limited to, informing Director SHS, Privacy office, Police personnel, Communications and Computing Services etc...

7.0 Personal Right to Access, Withdraw and Correction

You have the right to access and/or correct your personal/private information that is created or utilized by SHS. You may also provide consent to permit third party access (i.e providing parental access to finance, application or conduct history) or to withdraw /restrict some of the uses of personal information by SHS (subject to departmental need and service provision). Please note some requests related to withdrawal may not be permitted.

8.0 Questions Related to Private Information

For additional information, questions or concerns related to this policy please contact Student Housing Services. Depending on the nature of the request you will be directed to the most appropriate personnel. For overall questions and concerns related to Student Housing Services please contact the Director of Student Housing Services. For questions regarding the University's policy contact the University Privacy Office at fippa@uoguelph.ca.