



Section		Page
<b>Client Privacy Policy</b>		1 of 4
<b>Operational Procedures</b>		Date April 6, 2016 Revised June 11, 2025
<b>Statement</b>	<p>The Sudbury Student Services Consortium (“Consortium”) recognizes the importance of protecting privacy and the sensitivity of personal information.</p> <p>The Sudbury Student Services Consortium is committed to protecting personal information of students and their families, as well as of other external parties in compliance with the <i>Municipal Freedom of Information and Protection of Privacy Act</i> (MFIPPA). This policy outlines the authority for the collection, use, and disclosure of personal information by the Consortium.</p>	
<b>Procedure</b>	<p><b><u>Definition</u></b></p> <p>Personal information: Information about an identifiable individual.</p> <p><b><u>Guidelines</u></b></p> <p>In accordance with MFIPPA, the Sudbury Student Services Consortium collects, uses, and discloses student and family personal information further to the authority of the <i>Education Act</i> and this policy.</p> <p>The Executive Director is responsible for the Consortium’s privacy policies and practices. Any questions, concerns, or complaints regarding this policy can be addressed to them.</p> <p><b><u>Collection and Use</u></b></p> <p>Personal information is only collected for the purpose of providing safe and reliable student transportation services. Sudbury Student Services Consortium collects the following personal information about students for the purpose of providing safe and reliable student transportation services:</p> <ul style="list-style-type: none"> <li>• Names</li> <li>• Birth Dates</li> <li>• Grades &amp; Schools</li> <li>• Identification numbers</li> </ul>	

- Contact information such as telephone numbers and email addresses
- Residence and transportation addresses
- Medical needs and requirements
- Attendance information
- Any information relevant to the purpose of safe transportation

This information is collected from parents and guardians, and from its member school boards, First Nations bands and Huron Superior Catholic District School Board.

Personal information collected by the Sudbury Student Services Consortium is used for the following purposes:

- Providing student transportation;
- Ensuring students are safely boarding and deboarding at their assigned and correct schools and/or bus stops by the use of a QR code card,
- Communicating with affected parents and guardians in emergency situations, such as the accuracy of students involved in a collision,
- Communicating exposure to parents, guardians, schools, school boards and/or the Public Health when specifically dealing with a communicable disease,
- Understanding student needs,
- Servicing our students,
- Meeting legal, regulatory and contractual requirements, and providing materials concerning our services and developments in student transportation.

Student personal information is used and/ or disclosed solely for the purpose it was collected or in accordance with legal requirements. If it is to be used or disclosed for a reason other than which it was originally collected, the Consortium will obtain consent or will receive prior notice.

### **Disclosure**

Sudbury Student Services Consortium may disclose personal information to:

- Contracted school bus or taxi operators;
- Law enforcement or police services if information is required for investigative purposes for example during a collision investigation;
- Routing Software and IT providers in order to provide administrative, routing services, attendance and GPS functionalities;
- As otherwise required by law.

### **Third-Party Policy**

The Consortium maintains strict agreements with third-party providers to ensure data protection.

- Data remains the property of the Consortium and is used solely for providing transportation services.

Protection measures include:

- Encryption during transmission, storage, and processing.
- Limited driver access to essential trip information, which is erased after each trip.
- Mobile Device Management (MDM) to secure and remotely manage driver tablets.

Data is purged annually, with no retained copies.

Confidentiality and Training:

Third-party employees, including bus drivers, sign confidentiality agreements and undergo training on data sensitivity.

### **Consent**

Sudbury Student Services Consortium obtains consent from individuals to collect, use, and disclose personal information where required by law. The way consent is obtained varies depending on the circumstances and the type of personal information collected, including by school boards on registration forms at the time of student enrollment, verbally, written or electronically, via the Consortium Parent Portal or by email, or through the Consortium directly from parents and guardians.

### **Safeguarding Personal Information**

The Sudbury Student Services Consortium is responsible for the personal information in its possession and control, including information shared with a third party for processing. When information is shared with a third party, contracts are in place to ensure that information shared is adequately protected.

Personal information may be stored in physical or electronic files. and is safeguarded from unauthorized access, disclosure, use, or modification and against theft or loss regardless of the format in which it is stored. Appropriate safeguards are put in place based on the sensitivity of the information.

Personal information is protected through physical, organizational, and technical measures. Access to student personal information is restricted to employees and other agents of the Consortium who require the information to perform their job duties, and to those otherwise authorized by law. The Consortium's computer network systems and databases are secured by complex passwords. Physical files are kept in locked filing cabinets within locked rooms. The Consortium ensures that employees who handle client personal information are aware of and understand the importance of maintaining the confidentiality

of such information.

The Consortium retains personal information only for the duration it is needed. Once personal information is no longer required, it is destroyed promptly, safely, and securely. Where law or policy requires that personal information be kept for a specified amount of time, the Consortium complies with the applicable legislation or in accordance with the retention schedule.

### **Access to and Amending Personal Information**

Students may request access to their personal information held by the Sudbury Student Services Consortium in accordance with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). Written requests may be submitted to the Executive Director at 199 Travers Street, Sudbury Ontario together with a \$5.00 fee. Additional fees may be charged to access information. The Consortium responds to all requests for access within 30 days. If the Sudbury Student Services Consortium denies a request for access to personal information, the Consortium will provide an explanation for the refusal, in accordance with MFIPPA

If an individual finds errors in their personal information, they may submit a request to have the Consortium make any necessary corrections. The Consortium updates any incorrect information and ensures the information is also updated by applicable third parties.

### **Employment Inquiries**

When one applies to the Sudbury Student Services Consortium for a job, personal information is considered as part of our review process. We normally retain information from candidates for a limited time after a decision has been made, unless the individual asks us not to retain the information. If a job offer is accepted, the information will be retained in accordance with our privacy procedures for employee records.

### **Website**

Our website contains links to other sites, which are not governed by this privacy policy. On our website, like most other commercial websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service.