

Best Information Management Practices in Teaching Roles

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Purpose

- **The appropriate management of personal information is important to encourage:**
 - Respect for Students' Rights to Privacy
 - Respect for Colleagues' Rights to Privacy
 - Transparency and Protection of Information in the Public Interest
- **The responsibility to manage personal information appropriately falls on all employees at universities and colleges including:**
 - Staff
 - Faculty
 - Student Employees (i.e Teaching and Research Assistants)

Overview

- What is Personal Information?
- Collecting Personal Information
- Managing Collected Personal Information (See Handout A)
- Informed Consent
- Privacy Impact Assessments for Instructional Aides
- Audio/Visual Hacking
- Requests for Information (See Handout B)

What is personal information?

- Under British Columbia's Freedom of Information and Protection of Privacy Act, personal information means:
 - “recorded information about an identifiable individual other than contact information”
- Personal information includes but is not limited to: program of study, registered courses, grades, performance data, evaluations, character references, and any information about an identified individual provided in explicit or inferred confidence.

How do I determine what types of personal information I am allowed to collect?

- **Is the information required for you to teach and evaluate the student?**
 - Only collect and retain personal information if you can answer this question with a definite yes.
 - Otherwise personal information may be read but then must be deleted, destroyed, or returned if that information does not meet this criteria. Do not create a copy to retain.
 - Do not record student personal experiences expressed in class without explicit informed consent. If the student is expected to record personal experiences as part of an assignment, mark and return that assignment as soon as possible.
 - Remove personal identifiers and make notes vague enough that the individual cannot be identified if students make points in class you want to consider afterwards.

Personal information must be collected directly from the individual unless:

- The individual authorizes an indirect method of collecting the information.
- To determine suitability for an award such as honorary degree, scholarship, prize or bursary.
- Disclosure would be reasonably required to reduce risk of, or prevent, domestic violence.
- Law enforcement demands the information or a subpoena demands the information. Contact your Privacy Officer for help!
- Do not provide any personal information about a student to a parent or friend until you have ensured a third party authorization form has been completed authorizing that parent or friend to receive the personal information requested.

Informed Consent

- Anytime personal information is collected or disclosed, the individual the information is collected from must be informed of:
 - The purpose for collecting the information
 - The legal authority to collect the information
 - Name and business contact information of a public body employee that can answer questions regarding the collection.

Privacy Impact Assessments for Instructional Aides

- A Privacy Impact Assessment needs to be completed on any product or initiative that will require demographic information or the student's performance data to leave university or college's servers or be provided to departments that would not usually have access to the student's personal information.
- A Privacy Impact Assessment is not required for online resources attached to textbooks that only provide supplementary information but do not require students to register to use a service.
- If you are asking students to provide their personal information to services outside of university or college or to unexpected departments, ask the Privacy Officer for assistance in planning the management of this personal information.

Audio/Visual Hacking

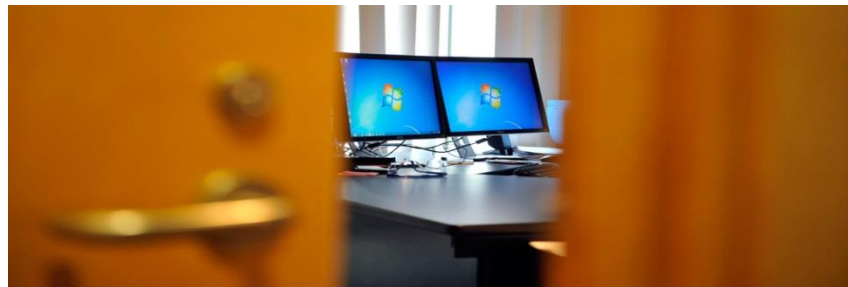
- You do not need to be cyber hacked or your office broken into to unintentionally expose personal information.
- Be aware of your surroundings! Is it appropriate to disclose personal information to those around you?
- Be aware of what you say! Remove identifiers from what you say when you are talking to others about your teaching.
- Be aware of who can see your work! Avoid managing personal information on cell phones and laptops in public areas. Be aware of paper records you have on your desk.

Privacy Breaches

- **Unauthorized or unintentional disclosure of personal information is called a privacy breach**
- **If you have caused a privacy breach or suspect that a privacy breach has occurred do the following:**
 - Report the breach to the chair, dean, director or other supervisor.
 - Report the breach to the Privacy Officer.
 - Report the breach to the CIO if a device was lost or stolen or if a system has been compromised.
 - Provide a description of the records that were breached including types of personal information, estimated volume of personal information, and number of individuals impacted.
 - If the unintended recipient(s) can be identified, request that the records are returned or destroyed. Ask them to provide evidence that their copy of the record has been destroyed and forward the response to your request, or your request itself if there isn't a response to privacy@unbc.ca.

Privacy Protection Offences

- A university employee who knowingly provides unauthorized disclosure of personal information and/or purposefully fails to notify individuals when unauthorized disclosure of personal information has occurred may be fined up to \$2000.
- The university itself could receive a significantly larger fine of up to \$500 000.
- Does not apply to disclosure conducted in good faith



Need help?

If you have any questions regarding your responsibility to protect the privacy of the personal information you manage please contact:

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