

# Protecting Student Privacy in Email

**Records Management & Privacy Office**  
**17 January 2018**



# Agenda



- 1) What are our privacy responsibilities under FIPPA?
- 2) Can we put student personal information in an email?

# What is privacy?



- Privacy is about having the ability to control or influence the way in which information about you is collected, used and disclosed. Information privacy may also be described as “informational self-determination.”
- Under FIPPA, individuals have a right to privacy with respect to the personal information about them held by Queen’s, and a right to access that information



Information and Privacy  
Commissioner of Ontario

Commissaire à l'information et à la  
protection de la vie privée de l'Ontario

# Collecting personal information



- FIPPA says we can collect personal information if the collection is:
  - authorized by statute,
  - used for the purposes of law enforcement, or
  - necessary to the proper administration of a lawfully authorized activity.
- The University must provide proper “notice”
  - <http://www.queensu.ca/accessandprivacy/privacy/notice-collection>

# Using and disclosing personal information



- Use personal information for the purpose for which it was collected, or a consistent purpose
- Disclose personal information to the individual to whom it pertains
- Disclose to someone else for a variety of purposes (e.g., health and safety, law enforcement)

# Disclosing personal information internally

- Personal information may be disclosed within the University:
  - to an employee of the institution, or to a consultant or an agent, who needs the record in the performance of duties and where disclosure is **necessary and proper** in the discharge of the institution's functions
    - If you are asked for an individual's personal information by another employee, that employee is responsible for assuring you that it is being requested for “**necessary and proper**” purposes related to legitimate duties.



# How do we use and disclose student PI securely?



# The trouble with email



## What goes wrong?

- message sent to the wrong person(s)
- message is forwarded to an unauthorized person
- message is forwarded to a personal email account
- a confidential attachment is inadvertently included

## Why does it happen?

- people with similar names
- auto-fill “To” function
- failing to use the “Bcc” function
- listserv (mis)functionality
- mail merge function
- inattention
- working too quickly



# More email problems

- It's rarely filed in an office recordkeeping system so it is uncontrolled and unmanaged
- It multiplies like rabbits
- It's never deleted (except by accident)



# So can we send student PI in an email?



- Yes, until we have better tools
- CAVEATS:
  - use *@queensu.ca* email accounts only
  - do not forward to personal email accounts
  - ensure all devices are encrypted
  - send sensitive or confidential information (e.g., doctor's note), as an encrypted attachment
- ✓ Best Practice: do not use the full student number and full student name; use truncated forms

# Avoiding a privacy breach with email



- ✓ Assess whether email is the proper tool
- ✓ Consider the sensitivity of the personal information
- ✓ Encrypt email attachments (and all devices)
- ✓ Slow down...take a breath...review the addressee once, twice, three times...press send

# ENCRYPT ALL DEVICES!



See the encryption tutorials on the ITS website:

<http://www.queensu.ca/its/security/encryption-service/tutorials>

# What to do if a privacy breach occurs



1. Stop the breach
2. Report it to your supervisor immediately
3. Contact the Privacy Office
4. Complete the Privacy Breach Report Form

(<http://www.queensu.ca/accessandprivacy/privacy/privacy-breaches>)



- Records Management & Privacy Office website:  
<http://www.queensu.ca/accessandprivacy/>
  - Fact Sheets
    - *Data Security and Encryption: Handling Confidential & Personal Information*
    - *Using and Managing Email*
    - *Access and Privacy: A Primer for Faculty Members*
  - FAQs

# Contact



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