

CSAP Policy on the Protection of Privacy and the Public Reporting of Data

Seneca College and the College Student Achievement Project (CSAP) are bound by the provisions of the *Freedom of Information and Protection of Privacy Act* (FIPPA). CSAP is therefore obligated to protect the personal information it collects.

In addition, CSAP aggregates student data by college and school board to generate analyses, which are normally considered to be confidential to each college and school board, and CSAP is committed to respect and maintain this confidentiality.

The following policy statement outlines these obligations and indicates how they will be met operationally. Participating colleges will be asked to assert their agreement with this policy.

A. Student Personal Information

Students apply for admission to colleges through the Ontario College Application Services Inc. (OCAS) and in making such application, students consent to and authorize OCAS to disclose their personal information to colleges (and a number of other institutions) for “statistical and research purposes.”

CSAP undertakes its work on the basis of this consent and authorization, along with the policies in place concerning the use of student information in place at each college. While this consent is of a general nature, permitting disclosure for (any) “statistical and research purposes,” CSAP will, in addition, request each participating college to provide its own students with a more specific notice concerning its participation in CSAP, the purposes of CSAP, the use of student information in CSAP, and the CSAP Data Protection Policy. Such a notice will be communicated to students in a manner consistent with normal communication of academic policies within each college (including calendars, web sites, etc.).

It is a fundamental principle of the College Student Achievement Project that confidentiality of students’ data must be strictly maintained. Accordingly, CSAP undertakes the following steps:

A1. Participating colleges send required student information to the CSAP Data Analysis Centre at Seneca College with college student ID numbers only and retain the names and other personal identifiers of students.

A2. At the CSAP Data Analysis Centre, the records are combined, then stripped of original student IDs and a new, randomly generated, CSAP student ID code number substituted.

A3. The links between the new CSAP student ID and the original college student ID are held securely at Seneca College by the CSAP Data Manager and one colleague (both bound by confidentiality agreements) and are not available to any other person.

A4. Following the completion of each year's research (e.g., in January 2013 for the CSAP 2012 project which collected data on students entering college in Fall 2012), these links to the original student IDs are destroyed.

A5. In all published CSAP reports, including data views from the CSAP database which are made available to colleges and school boards, data concerning any group smaller than five students are not displayed.

Thereafter, data used by CSAP are not considered to be "personal information" (as defined by FIPPA) since no student is identifiable from CSAP data.

B. Reporting of Aggregated College Data

Some data supplied by each college to the College Student Achievement Project is normally considered to be confidential to each college (e.g. pass rates in specific programs). CSAP respects such confidentiality when it publishes its data and analyses both publicly and to other participating colleges. Data will be aggregated and analysed by college and program and reported as follows.

- Public documents and research analyses reported in any form will contain data either aggregated across all colleges or in a form where the confidentiality of each college's data is protected by a code number, which is disclosed only to authorized representatives of that college.
- In addition, analyses available to each college will include that college's data together with the aggregated data. In other words, colleges are permitted to see their own data and the aggregate data but not data of other individual colleges.

C. Reporting of Aggregated School and School Board Data

While school and board identifiers are present on extracts from student admission files, these will not be published in the analysis of board and school data. In addition, information such as the total numbers of students will be removed, to ensure that a board cannot be identified specifically.

Analyses reported to each school board will include that board's data (including data for each secondary school) together with the aggregated data. In other words, boards are permitted to see their own data (including that of individual schools) and the aggregate data but not data of other individual school boards.

D. Reporting to Government, Agencies, Media

Dissemination of information is essential to the attainment of the long term goals of CSAP and to meet funding requirements. To this end the CSAP project team will prepare reports, research briefs and presentations. The identities of individual colleges, boards and schools will be protected; names/existing identifiers will be replaced with a code and total numbers removed in order to ensure that no college, board or school can be specifically identified.