

# **PRIVACY CHALLENGE**

## **The Limiting Collection Principle**



« JE DOIS PHOTOCOPIER VOTRE PERMIS DE CONDUIRE. »

"I'LL NEED TO PHOTOCOPY YOUR DRIVER'S LICENSE."

#### Why Is This Important?

Because **data minimization** is fundamental to Canadian privacy laws. Minimizing the amount of personal information we collect and retain **reduces risk** because it means less personal information on hand that is vulnerable to data security incidents such as breaches or cyberattacks.

## How Do We Prevent Over-Collection?

Think about what personal information you need to perform your job. Be specific. Try to distinguish between what you need and what you would like. Be critical of past practices. Just because we traditionally collected it doesn't mean we need it or have the legal authority to collect it.

"...maintaining custody of large amounts of sensitive information can be a liability, particularly if the information does not meet any legitimate purpose or if the retention period is longer than necessary... Collecting and retaining excessive personal information creates an unnecessary security burden. Thus, organizations should collect only the minimum amount of information necessary for the stated purposes and retain it only for as long as necessary, while keeping it secure." —Privacy Commissioner of Canada

### Challenge:

Find a form or survey you have used recently or one that your school or the board uses. Is there anything you see that might be unnecessary to collect? Why do we collect more than we need?

## Ways in Which We May Be Over-Collecting

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- Retaining copies of birth certificates, passports, driver's licences in OSRs instead of shredding them once student information is verified and entered into PowerSchool at registration.
- Including fields on forms for personal information that has no strategic purpose, e.g., asking parents/guardians to provide the name of their employer when we don't really need to know where they work; we just need phone numbers for where they can be reached.

Your organization's rights and responsibilities under the "Limiting Collection" principle: a resource from the Privacy Commissioner of Canada.