



## Commitment to the Responsible Use of Student Data

### Introduction

This document builds on the University's guiding principles for its institutional data governance program. The guiding principles are very broad in scope. This document provides more specific recommendations on appropriate collection, use, and protection of student data.

### Scope

This guidance document applies to any faculty or staff who works with the University's institutional data pertaining to prospective, current, and past students.

#### Acceptable Uses

The University is committed to supporting the learning needs of our entire student body.

Student data should be used to support student success by:

- informing, engaging, and empowering students to take responsibility for their learning
- ensuring alignment of academic offerings with needs and goals of students
- informing course and program review and re-design processes
- enhancing equity-driven outcomes and reducing barriers to student learning and success.

While use of student data for scholarly purposes is not limited to the purposes described above, the proposed scholarly research should not undermine the purposes described above.

#### Accountability and Responsibility

Data Trustees are assigned accountability for the secure and appropriate use and management of student data (e.g., The University Registrar is the data trustee of for student records).

Wherever possible, individuals requesting to use student data will be provided access to the data in a secure environment sanctioned by the University.

Individuals granted access to student data are responsible for the appropriate use and protection of the data granted to their custody.

### Conditions of Use

Any use or processing of student data is subject to the requirements of:

- (a) the Freedom of Information and Protection of Privacy Act (FIPPA) and its regulations, and
- (b) university policies and guidance for the secure management of the data.

Uses of student data that are not enabled by notice under [Ontario's Freedom of Information and Protection of Privacy Act](#) may require individual consent.

Identifiable student data should be used only when the purpose cannot be accomplished using de-identified or anonymized data.

In all other circumstances, de-identified or anonymized data should be used. De-identification should occur at the earliest opportunity in the data lifecycle and reidentification of this data should be explicitly prohibited.

Those accessing student data should only have access to the minimum student data required to meet the stated purpose.

Use of the data will be confined to the purposes approved by the data trustee or delegated authority. If the user wishes to use the data for a purpose outside the scope of the original approval, then a new request must be made.

All users of student data will be subject to a written confidentiality agreement.

In the event of misuse or breach of student information, the University will notify affected students of the breach and available remedies.

Student data are subject to data retention policies; disposal and archiving of student records follows the University's retention and disposition schedules.

All use of data for scholarly research is subject to applicable Research Ethics Board review and the University's Common Review Process.

### Partnership and Inclusivity

All data are contextual. Students, instructors, and academic units should be involved, as appropriate, at key stages of analytics initiatives using student data to provide that contextual understanding. This may be accomplished through established structures within the university or on an ad hoc basis.

### Transparency

The University will communicate to students in plain language:

- how we collect and use student data,
- with whom we share data,
- where consent applies,
- where responsibilities lie for the ethical use of student data, and
- whom to contact for further information about use of student data.

The University will have a designated location where students can go to learn about their rights and have their questions about student data collection, use, access, and security answered.

### **Integrity**

Student data should be used to inform and not replace the professional judgment of educators and educational administrators.

Recognising that data and algorithms can contain and perpetuate bias, we will actively work to identify and minimise any potential negative impacts.

Any conflicts of interest – whether actual, potential, or perceived – on the part of anyone accessing, analysing, or acting upon student data will be declared to the data trustee at the time of application and management of that conflict will be taken into consideration when considering the application for use of the data.

If you have specific questions, please contact [data@utoronto.ca](mailto:data@utoronto.ca).