



EDUCATION DATA COLLECTION

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1. Purpose

This policy establishes a standardized, transparent, and accountable framework for the collection, use, disclosure, and governance of personal and educational information by the Education Department.

The policy ensures that information is managed in a manner that:

- Supports effective program delivery and student success
- Protects the confidentiality and integrity of personal information
- Enables informed planning, reporting, and decision-making
- Maintains accountability to members and the community

2. Scope

This policy applies to:

- All Education Department programs and services, including:
 - o K-12 Education
 - o Post-Secondary Education
 - o Adult Education and Training
 - o Education Transportation
 - o Student Supports
 - o Special Education
- All Departmental staff, contractors, and representatives
- All personal and educational information collected, stored, or used by the Education Department

This policy is enacted under the WFN's inherent jurisdiction over education and the administration of education programs and services.

3. Related Documents

- Education's Document Retention Policy
 - o 500-POL-DATA-Education_Document_Retention
- Education's Duty to Report Procedure
 - o 004.01-PRO-GOV-Education_Duty_to_Report
- Education's Reporting Requirements
 - o 006.01-PRO-GOV-Education_Reporting_Requirements
- WFN's Education Law
- Program-specific application and consent forms
- WFN's Request for Information (RFI) Policy

4. Definitions

4.1. Consent

Permission provided by a student or parent/legal guardian for the collection, use, or disclosure of information.

4.2. Educational Information

Information related to a student's educational experience, including attendance, achievement, assessments, and supports received.

4.3. Explicit Consent

Written, informed consent required for disclosure of information outside the Education Department.

4.4. Implied Consent

Consent reasonably inferred for internal program delivery purposes.

4.5. Lawful

For the purposes of Education Department policies and procedures, lawful refers to actions, decisions, collections, uses, disclosures, or processes authorized under Wahnapiṭae First Nation jurisdiction, including its laws, policies, procedures, delegated authorities, and any other applicable legal or regulatory obligations.

4.6. Personal Information

Information that identifies an individual, including but not limited to name, date of birth, contact information, and identifying numbers.

5. Guiding Principles

Data collected by the Education Department shall be governed by the following principles:

- Information is collected and used only for legitimate Education Department purposes
- Individuals have the right to understand how their information is used
- Information sharing is limited to those with a legitimate need to know
- Confidentiality is maintained except where disclosure is required for program delivery, safety, or legal obligations
- Data practices support student success, wellbeing, and community accountability

6. Data Collection

The Education Department may collect personal and educational information necessary to:

- Deliver and administer programs and services
- Determine eligibility for programs and supports
- Monitor student progress and outcomes
- Plan and improve education programs
- Meet reporting and accountability requirements for funders

Data collected may include, but is not limited to:

- Student identification and demographic information
- School enrollment and Ontario Education Number
- Attendance, academic performance, and assessments
- Program participation and services received
- Parent or guardian contact information

7. Data Classification

These classification levels guide access, use, and disclosure requirements and all information shall be classified as follows:

7.1. Level 1 – General Information

Basic identifying and enrollment information.

7.2. Level 2 – Sensitive Educational Information

Academic records, assessments, attendance, and program supports.

7.3. Level 3 – Highly Sensitive Information

Health-related information, safety concerns, and duty-to-report related information

The Education Department shall collect only the personal and educational information that is reasonably necessary to fulfill the purposes outlined in this policy.

8. Consent

8.1. Implied Consent

Implied consent applies to the internal collection and use of personal and educational information for:

- Lawful program delivery and administration
- Lawful eligibility determination
- Internal planning and reporting
- Lawful service coordination within the Department

8.2. Explicit Consent

Explicit, written consent is required for the disclosure of personal or educational information outside of the Education Department, including:

- Kinoomaadziwin Education Body (KEB)
- Ontario Ministry of Education, including District School Boards
- External program partners or service providers, for educational purposes

Consent must clearly identify:

- What information will be shared
- The purpose of sharing
- The organizations receiving the information

Where required for program eligibility, service delivery, reporting obligations, or lawful delivery of services, consent to share information is a condition of participation in applicable programs or services. Without such consent, the Education Department may be unable to provide said programs or services.

8.3. Age of Consent

- Students aged 16 years or older may provide consent independently unless capacity to do so has been explicitly denied by a court.
- For students under 16, consent must be provided by a parent or legal guardian
 - o In the event of consent being provided by a guardian, proof of guardianship will be required.

8.4. Withdrawal of Consent

Consent may be withdrawn in writing at any time.

Where consent is withdrawn:

- Programs or services requiring that information may be suspended or terminated
- The individual will be informed of the impacts of withdrawal

9. Information Sharing and Aggregated Data

9.1. Identifiable Information Sharing

Identifiable personal and educational information may be shared externally only where:

- Explicit consent has been obtained, and
- Sharing is necessary for program delivery, eligibility verification, reporting, or student support

This may include:

- Student name, date of birth, and Ontario Education Number
- Attendance and academic records
- Assessment results and program participation
- Special education supports and services

9.2. Aggregated Data Sharing

The Education Department may share aggregated data with external organizations, including the KEB, for:

- Education system planning
- Program evaluation and improvement
- Reporting and accountability
- Statistical analysis

Aggregated data may include:

- Total enrollment
- Attendance trends
- Credit accumulation and graduation rates
- Program participation
- General demographic distributions

9.3. Anonymization Requirement

Where aggregated data is shared:

- Data shall be anonymized wherever possible
- Personal identifiers shall be removed prior to sharing
- Data shall be presented in a manner that prevents identification of individual students

Where anonymization is not possible:

- Additional safeguards shall be applied, or
- The data shall not be shared

9.4. Internal Use of Aggregated Data

Aggregated data may be used internally to:

- Inform program development
- Support strategic planning
- Enhance reporting to leadership and community

10. Use of Information

Information shall be used only for:

- Program delivery and administration
- Determining eligibility and supports
- Monitoring student progress and outcomes
- Improving program effectiveness
- Supporting reporting and accountability
- Education-related research and statistical analysis

11. Disclosure Limitations

Information shall not be disclosed:

- Without appropriate consent, unless required by law or duty to report
- For purposes unrelated to Education programming
- In a manner that compromises confidentiality or student wellbeing

Where disclosure is required under duty to report obligations, confidentiality limitations apply.

12. Data Storage and Records Management

Storage, retention, and destruction of information are governed by the Education Document Retention Policy.

13. Data Access and Correction

Individuals may request access to or correction of their information through the WFN Request for Information (RFI) Policy

14. Data Integration and Centralization

Education data shall be:

- Logged within program-level data collection systems
- Maintained in a consistent format
- Integrated into a centralized Master Data system where applicable

This supports:

- Data consistency
- Reduced duplication
- Improved reporting and planning

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15. Roles and Responsibilities

15.1. Education Department

- Ensures implementation and Compliance
- Maintains oversight of data governance

15.2. Program Leads

- Ensure compliant data collection and use
- Monitor adherence to policy

15.3. Program Staff

- Collect accurate information
- Maintain confidentiality
- Follow consent and disclosure requirements

15.4. Education Director/ Services Manager

- Provide oversight and enforcement
- Review compliance and practices
- Manage breaches and escalations

16. Breaches and Non-Compliance

All breaches must be:

- Immediately reported to the Education Services Manager
- Documented and reviewed
- Addressed through corrective action

Where required:

- Affected individuals may be notified
- Safeguards shall be strengthened

17. Internal Audits

The Education Department shall conduct periodic audits to:

- Ensure compliance with this policy
- Verify appropriate data handling and consent practices
- Identify risks and gaps

Audit results shall inform:

- Process improvements
- Accountability measures
- Policy updates

18. Review and Revision

This policy shall be reviewed as required to ensure alignment with operational needs, consistency with governance frameworks, and ongoing protection of student information.

Minor or administrative amendments to this policy that do not alter its intention or core criteria may be made with the approval of the Executive Director, without requiring formal review or approval by Chief and Council.

18.1. REVISION HISTORY

Date: (mm/dd/yyyy)	Motions