

## Real Estate Training Program Directive

### Privacy

<b>Classification</b>	Real Estate Training Programs
<b>Responsible Authority</b>	Program Manager, Real Estate Training
<b>Executive Sponsor</b>	Senior Vice President, Academic
<b>Approval Authority</b>	Executive Director, Online and Professional Training
<b>Date First Approved</b>	2025-05-30
<b>Date Last Reviewed</b>	N/A
<b>Date to Complete Mandatory Review</b>	2026-05-29

### Purpose

To confirm Algonquin College's commitment to protecting the privacy and personal information of learners enrolled in Real Estate Training programs, in accordance with the *Freedom of Information and Protection of Privacy Act, 1990 (FIPPA)* and RECO-specific privacy requirements.

### Scope

This directive applies to all learners enrolled in the Real Estate Council of Ontario's (RECO) approved Real Estate Registration Training Programs. These include the Real Estate Salesperson Program, consisting of the Pre-Registration Phase and the Post-Registration Phase, and the Real Estate Broker Program at Algonquin College.

## Definitions

<b>Personal Information</b>	Any recorded information about an identifiable individual, including but not limited to name, contact information, date of birth, learner identification number, and educational records.
<b>FIPPA</b>	The <i>Freedom of Information and Protection of Privacy Act, 1990</i> , a law that governs the collection, use, and disclosure of personal information by public institutions in Ontario.
<b>Privacy Breach</b>	An incident where personal information is collected, used, disclosed, retained, or disposed of in ways that are not authorized by law or policy.
<b>Assessment Service Provider (ASP)</b>	Designated Exam Provider. A Designate that develops and administers exams on behalf of RECO.

## Policy

Algonquin College (the “College”) is committed to protecting the privacy of learners’ personal information. The College collects, uses, and discloses personal information in accordance with the *Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. F.31 (“FIPPA”)*, and under authority of the *Ontario Colleges of Applied Arts and Technology Act, 2002, S.O. 2002, c. 8, Sched. F*, as well as other applicable legislation. The College’s personal information practices are outlined in more detail in its [Privacy Statement](#).

As a designated education provider for the Real Estate Council of Ontario (RECO), the College is required to collect and share certain personal information for the purposes of delivering RECO’s Salesperson and Broker Registration Training Programs (SREP and BREP). This includes the disclosure of learner information such as name, contact information, learner identification number, course performance, and completion data to:

- **RECO**, for regulatory and program oversight purposes; and
- **RECO’s Assessment Service Provider (ASP)**, for the administration and delivery of program examinations.

Instances of misconduct related to program participation may also be disclosed to RECO. These disclosures are in alignment with the requirements established by RECO to support program quality, integrity, and compliance with applicable legislation.

The protection of personal information is a shared responsibility that extends across all levels of the organization. All individuals involved in the delivery and administration of the RECO programs, including learners, employees, and managers, have a role to play in safeguarding the privacy and security of

information. The following outlines the responsibilities of each group to ensure compliance with applicable policies, legislation, and contractual obligations.

### **1.0 Learner Responsibilities:**

1. Learners must adhere to this directive and related directives.
2. Learners must immediately notify the Program Manager of any actual or suspected security incidents or privacy breaches.

### **2.0 Employees and Facilitators Responsibilities**

1. Employees and Facilitators must adequately protect information and IT systems in their care and custody at all times.
2. Employees and Facilitators must adhere to all Algonquin College policies and procedures, including [IT01: Information Security](#).
3. Employees and Facilitators must immediately notify their Manager and the Manager, Information Security and Privacy, of any actual or suspected security incidents or privacy breaches.

### **3.0 Management Responsibilities**

1. The Manager in charge of the department is responsible for the security of information and IT systems handled by the business unit, as well as the associated risks.
2. Managers must support information security efforts with their teams on a top-down basis. This typically includes but is not limited to planning and discussion activities, funding security safeguards where required, encouraging employee attendance at security and privacy training sessions, and inclusion of employee information security responsibilities in position descriptions.
3. Employees must adhere to all Algonquin College policies and procedures, including [IT01: Information Security](#).
4. Managers must immediately notify the Manager, Information Security and Privacy of any actual or suspected security incidents or privacy breaches. Notification must be made via phone.

### **4.0 Data Location**

All learner and program records, whether electronic or hard copy, are stored exclusively in Canada or the United States in secure environments that meet or exceed FIPPA requirements.

## 5.0 Mandatory Disclosures

The College will disclose to:

- **RECO** – learner name, contact details, RECO-issued identifier, course-completion data, grades, and any findings or sanctions resulting from misconduct investigations.
- **Assessment Service Provider (RECO-designated Exam Provider)** – learner identifiers, contact details, and eligibility status for the sole purpose of exam scheduling and delivery. Learners acknowledge these disclosures at enrolment.

## 6.0 Privacy Breach Response

Suspected or confirmed breaches of personal information are escalated to the College Privacy Officer within **24 hours**. The Officer will: (1) contain the breach, (2) assess risk, (3) notify affected individuals, RECO, and the Information & Privacy Commissioner of Ontario as required, and (4) implement remedial action. A written incident report is sent to RECO within **five (5) business days**.

## Procedure

	Action	Responsibility
01	<p><b>Collection and Consent</b></p> <p>Learners will be advised upon admission that their personal information will be collected, stored, and shared in accordance with this directive and RECO guidelines. Consent is implied through enrollment.</p> <p>Learners will be informed upon admission that their personal information will be collected, used, stored, and shared in accordance with this directive, applicable privacy legislation, and RECO requirements. By enrolling in the program, learners provide implied consent for the collection, use, and disclosure of their personal information for educational, administrative, and regulatory purposes.</p> <p>Learners have the right to withdraw their consent at any time. However, because certain personal information is essential to administer the program, comply with RECO's regulatory requirements, and issue educational credentials, withdrawing consent may affect the learner's ability to continue in the program. The College will inform the learner</p>	Program Support Officer

of the implications of withdrawal and will make reasonable efforts to respond to their request in accordance with applicable legislation.

<b>02</b>	<b>Data Management and Disclosure</b> Learner data will be: <ol style="list-style-type: none"> <li>1. Collected through secure portals or approved channels;</li> <li>2. Used solely for educational, administrative, and regulatory purposes;</li> <li>3. Disclosed only to RECO, the ASP, or other legally authorized bodies.</li> </ol>	Program Manager
<b>03</b>	<b>Privacy Breach Response</b> Any suspected or confirmed privacy breach will be reported immediately to the College's Privacy Officer, as outlined in the policy responsibilities. Investigations will be governed under policy IT01: Information Security.	Students, Employees, Facilitators, and Program Manager

## Related Policies

### AD02: Freedom of Information

<https://www.algonquincollege.com/policies/files/2024/08/AD02.pdf>

### IT01: Information Security

<https://www.algonquincollege.com/policies/files/2021/01/IT01.pdf>

## Related Materials

### Algonquin College Privacy Statement

<https://www.algonquincollege.com/policies/privacy/>

### Information Security and Privacy Website

<https://www.algonquincollege.com/infosec>