

 BRANDON UNIVERSITY	COVID-19 Vaccination Data Storage Policy	First Approved: <i>April 27, 2022</i>
		Updated:
Administrative Policy	Approved by <i>President's Administrative Council</i> Administered by <i>President & Vice-Chancellor</i>	Reviewed:

Brandon University (“the University”) established a COVID-19 Vaccination Policy (“Policy”) on September 27, 2021, and rescinded it on April 28, 2022. Under this Policy, the need to collect personal vaccination data was established as part of a multi-faceted approach to protecting the health and safety of the University community.

Important aspects of the Policy have been retained herein as relate specifically to the retention of the personal health information collected.

1.0 Privacy

The confidentiality and security of collected information is of utmost importance and the University is committed to protecting the personal health information privacy of all employees and students. The vaccination data was compiled to assist in maintaining the health and safety of all employees and students and will only be used for that purpose.

The personal health information collected pursuant to the COVID-19 Vaccination Policy, including vaccination status, medical contraindications for vaccination, and COVID 19 testing or antibody testing results, will be stored, accessed and destroyed in accordance with the *Personal Health Information Act*. Appropriate safeguards are in place to ensure the information is stored securely.

Access to information will be on a need-to-know basis and will be limited to those people who are engaged in the following functions on behalf of the University: (1) verifying vaccination status or COVID status, (2) assessing and developing accommodations, and (3) verifying one’s ability to participate in certain activities as per public health orders and/or BU policy. For students, that will be primarily staff in Student Services. For employees, it will be primarily staff in Human Resources. Limited information may shared in an accommodations process (i.e. that there is a need for an accommodation), but the grounds for the accommodation will remain confidential. Staff in IT Services will have access to information for system administration purposes only.

Personal health information collected under this policy will not be shared with faculty, staff, students, or management beyond those serving in the above limited functions.

2.0 Storage

Employees

A record of the vaccination status for employees will be maintained in the Human Resources Office, and will be held separate and distinct from personnel files. The record will be kept for as long as needed or for the duration of the COVID pandemic/endemic, whichever is shorter, as determined by the President.

Individual information will be destroyed within two months of an individual leaving the employment of the University. Human Resources will determine those employees whose records are to be destroyed.

Students

A record of the vaccination status for students will be maintained by Student Services (i.e. the Dean of Students). The record will be kept for as long as needed or for the duration of the COVID 19 pandemic/endemic, whichever is shorter, as determined by the President.

Individual information will be destroyed within twelve months of the student no longer being registered as a student of the University. The Registrar's Office will determine those students whose records are to be destroyed.

3.0 Withdrawal of Consent

Community Members may withdraw their consent for Brandon University to retain data pertaining to their vaccination status. In these instances, Brandon University will dispose the data and notify the user that the disposal has occurred.

4.0 Review

This Policy will regularly be reviewed and updated to align with the most current conditions of the COVID-19 pandemic/endemic. A review will be undertaken no later than December 15, 2022. Updates to the policy will be communicated to the campus community in a clear and timely manner.

5.0 Related Legislation, Policies, and Procedures

- [The Freedom of Information and Protection of Privacy Act \(FIPPA\)](#)
- [The Personal Health Information Act \(PHIA\)](#)

This document is available in PDF format on the Brandon University website. This document can be attained in alternative formats from the Office of the President, Room 116 Clark Hall.