



SD 42 PROCEDURE: 5700.2

PERSONAL INFORMATION PROTECTION

PURPOSES

The School District takes seriously its obligations under the *Freedom of Information and Protection of Privacy Act* (FIPPA) regarding the processing and protection of personal information. The purpose of this Procedure is ensure that employees, students, parents and the public have access to information about how the School District collects, uses, discloses, protects and retains personal information.

PERSONAL INFORMATION THE SCHOOL DISTRICT COLLECTS

The School District endeavors to communicate the purposes for which personal information is collected at or before the time the information is collected, unless otherwise permitted or required by law.

The School District is authorized to collect certain information about students and their parents and guardians under the School Act for the purposes of delivering and administering educational programs and activities. This information includes:

- name, student number and contact information;
- educational history information;
- information about learning needs, assessments and special needs designations;
- medical information relevant to the delivery of educational services;
- information about family status and custody information;
- student performance and evaluation information;
- conduct and disciplinary history;
- other information the School District is required by law to maintain.

This information is used by the School District for purposes including: administering and delivering educational programs for students, accommodating student needs, communicating with parents and students, ensuring compliance with school rules and regulations, ensuring order and safety at school, evaluating student performance and complying with the School District's legal, regulatory and administrative requirements.

The School District maintains certain information about staff for the purposes of managing and administering the employment relationship. This information includes:

- name, social insurance and contact information;
- employment and educational history;
- qualifications and performance information;
- medical information that employees' voluntary provides as relevant to employment;
- conduct and disciplinary history;
- information about employee leaves and attendance;
- financial, taxation and beneficiary designation information for the purposes of administering payroll and benefits;
- other information the School District is required by law to maintain.

This information is used by the School District for the purposes of establishing, managing and terminating the employment relationship and for purposes that include: recruitment, administering payroll and benefits; performance evaluation and work assignment; maintaining order and safety at school; investigating and responding to workplace incidents, and complying with the School District's legal, administrative and other requirements.

Further information about the personal information that the School District collects, uses and maintains is available in the School District's Personal Information Directory published on the school district website.

SECURING PERSONAL INFORMATION

The School District protects personal information by ensuring security safeguards appropriate to the sensitivity of the information are in place. Such security safeguards include:

- Organizational safeguards, including practices that limit internal access to and use of personal information except on a need-to-know basis, ensure appropriate staff training, and maintaining regular review of privacy practice and programs;
- Physical safeguards, including practices that ensure that information is secure (i.e., locked cabinets and facilities), and, where appropriate, establishing systems to ensure access to personal information can be tracked and audited;
- Electronic safeguards, including the use of passwords; encryption; firewalls and other electronic measures designed to protected against the unauthorized collection, use and disclosure of personal information through the School District's electronic systems and networks.

RETENTION

Personal information will be retained only for as long as necessary for fulfillment of the purposes for which it was collected, or as required or permitted by law. Any personal information that is no longer required for either administrative, financial, legal or historical purposes shall be securely destroyed in a confidential manner in accordance with School District approved record retention protocols. However, personal information will be retained for specified periods where required by law.

The Freedom of Information and Protection of Privacy Act ("FIPPA") requires that any personal information that is used by the School District for deciding that directly affects an individual is to be retained by the School District for at least one year after being used.

EXPECTATIONS OF STAFF

The management and safekeeping of the personal information maintained by the School District is the responsibility of all staff, all of whom are expected to act consistently with the requirements of School District policies, this procedure and FIPPA. Staff acting inconsistently or in violation of these requirements may face disciplinary consequences, up to and including dismissal.

HOW THE SCHOOL DISTRICT MAINTAINS THE ACCURACY OF PERSONAL INFORMATION

Staff are expected to make every reasonable effort to ensure the accuracy of personal information that they collect and use. The School District also relies on students, parents and staff to update their personal and contact information with the School District from time to time.

If a person believes that there is an error or omission in his or her personal information collected by the School District, he or she is entitled to make a written request for correction under FIPPA.

The department head or designate is responsible for evaluating a correction request and making recommendations to the School District as to whether or not the correction is appropriate. The department head or designate should consult with the Freedom of Information Coordinator before responding to correction requests.

If a correction is made, the School District will notify any other public body or third party to whom it has provided the incorrect information in accordance with the requirements of FIPPA.

COMPLIANCE AND CONTACT INFORMATION

Requests for access to records, issues or complaints about the School District's compliance with this procedure and questions or comments about this procedure may be addressed to the School District's Privacy Officer at privacy@sd42.ca. All complaints made under this procedure will be investigated.

RECEIVED FOR INFORMATION: APRIL 29, 2020