
ADMINISTRATIVE PROCEDURE 256 PRIVACY IMPACT ASSESSMENTS

The *Freedom of Information and Protection of Privacy Act (FIPPA)* requires that Privacy Impact Assessments (PIAs) are conducted on any new or significantly revised initiative in order to identify and mitigate privacy risks that may arise and ensure that the privacy of individuals are appropriately protected.

Definitions

- Initiative – any enactment, system, project, program or activity of the District.
- Personal Information – any recorded information about an identifiable individual that is within the control of the District and includes information about any student or staff. Personal information does not include an individual's business contact information.
- Privacy Impact Assessment (PIA) – an in-depth review of any new or significantly revised initiative to ensure that the collection, use, disclosure, protection and processing of personal information by the District is compliant with *FIPPA*.
- Privacy Officer – the Secretary Treasurer or designate.
- Staff – the employees, contractors and volunteers of the District.
- Supplemental Review – an enhanced process for reviewing the privacy and data security measures in place when an initiative involves the storage of personal information outside of Canada.

Scope & Responsibility

This procedure applies to all new and significantly revised initiatives of the District.

Departments and management employees are responsible for planning and implementing new or significantly revised initiatives in accordance with the requirements of this procedure.

Responsibilities of the Privacy Officer

The Privacy Officer is responsible for ensuring that all PIAs and supplemental reviews are completed in accordance with the requirements of *FIPPA* and this procedure.

Responsibilities of All School District Staff

Any staff responsible for developing or introducing a new or significantly revised initiative that involves or may involve the collection, use, disclosure, or processing of personal information by the District must report that initiative to the Privacy Officer at an early stage of its development.

All staff will cooperate with the Privacy Officer and provide all requested information needed to complete the PIA and Supplementary Review, if deemed necessary.

The Role of the Responsible Employee

The Responsible Employee is the employee who is responsible for overseeing an initiative and will be indicated as such in the PIA. The Responsible Employee will:

- Ensure that new and significantly revised initiatives for which they are the responsible for are referred to the Privacy Officer for completion of a PIA.
- Support all required work necessary for the completion and approval of the PIA.
- Be familiar with and ensure that the initiative is carried out in compliance with the PIA.
- Request that the Privacy Officer make amendments to the PIA when required.

Initiatives involving the Storage of Personal Information outside of Canada

Employees may not engage in, or enter into a binding commitment to participate in, any new or significantly revised initiative that involves the storage of personal information outside of Canada until the Privacy Officer has completed and approved a PIA and supplemental review.

The Privacy Officer is responsible for determining whether a supplemental review is required in relation to any initiative.

The Privacy Officer is responsible for reviewing and approving all supplemental reviews and will consider the following risk factors:

- the likelihood that the initiative will give rise to an unauthorized, collection, use, disclosure or storage of personal information.
- the impact to an individual of an unauthorized collection, use, disclosure or storage of personal information.
- whether the personal information is stored by a service provider.
- where the personal information is stored.
- whether the Supplemental Review sets out mitigation strategies proportionate to the level of risk posted by the initiative.

Approval of a supplemental review by the Privacy Officer shall be documented in writing.

Contact Information

Questions or comments about this procedure may be addressed to the Privacy Officer.