ADMINISTRATIVE PROCEDURE 255 PERSONAL INFORMATION MANAGEMENT PROGRAM

The District expects all staff to follow information management practices that ensure compliance with the *Freedom of Information and Protection of Privacy Act* (*FIPPA)* and other applicable laws. Staff are responsible for:

- making reasonable efforts to familiarize themselves with *FIPPA* and the District's privacy policies and administrative procedures, which includes participating in privacy training offered by the District.
- following responsible information management practices to ensure that the District collects, uses, and discloses personal information in compliance with *FIPPA* and other applicable laws.
- protecting personal information against unauthorized collection, use, and disclosure, including limiting the sharing of sensitive personal information on a need-to-know basis.
- following procedures that facilitate the appropriate release of records within the District's custody or control in response to access requests received from members of the community under *FIPPA.*
- following District procedures for the completion of Privacy Impact Assessments (PIAs).
- reporting privacy breaches in accordance with District procedures.

Definitions

- Consent – express written consent to the collection, use or disclosure of personal information.
- 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 Breach – the theft or loss of, or the collection, use or disclosure of personal information not authorized by *FIPPA,* and includes cyber and ransomware attacks and other situations where there are reasonable grounds to believe that any such unauthorized activities have taken place or there is a reasonable belief that they will take place.
- Privacy Impact Assessments - an in-depth review of any new or significantly revised initiative to ensure that all collection, use, disclosure, protection and processing of personal information by the District is compliant with *FIPPA*.
- Privacy Officer – the Secretary Treasurer or designate.
- Records – any paper of electronic media used to store or record information, including all paper and electronic records, books, documents, photographs, audio or visual

recordings, computer files, email and correspondence; but does not include a computer program or other mechanism that produces records.

- Staff – the employees, contractors, and volunteers of the District.

Purposes for Collecting Personal Information

The purpose for which personal information is collected will be communicated at or before the time the information is collected, unless otherwise permitted or required by *FIPPA*.

Personal information about students and their parents/guardians/caregivers is authorized under the British Columbia *School Act* for the purposes of delivering and administering educational programs and activities. These purposes include:

- Registration, enrollment, and transfer of students.
- Providing and delivering educational programs and services.
- Accommodating students with disabilities and diverse abilities.
- Communicating with students and responding to inquiries or complaints.
- Preparing and providing assessments of student performance.
- Supervising and ensuring the safety and security of the District (such as the use of video surveillance).
- Investigating and responding to accidents, safety events, misconduct and similar incidents.
- Ensuring compliance with applicable District bylaws, policies, administrative procedures and other laws.
- Completing all required reports and filings to the Ministry of Advanced Education and Skills Training.

Personal information of prospective, current, and former staff may be collected for purposes of managing and administering the employment relationship. These purposes include:

- Hiring and recruitment.
- Managing and administering the employment relationship.
- Communicating with authorized union representatives.
- Administering employment compensation and benefits.
- Evaluating performance and managing disciplinary incidents.
- Supervising and ensuring the safety and security of the District (such as the use of video surveillance).
- Investigating and responding to accidents, safety events, misconduct, and similar incidents.

- Ensuring compliance with applicable school District policies and procedures, and other applicable laws.

Collection, Use and Disclosure of Personal Information

Personal information that is collected, utilized and disclosed will be limited to the following principles:

- The personal information is related to and necessary in order to carry out the District's programs and activities or for other purposes authorized by *FIPPA*.
- The personal information is collected by fair, lawful and transparent means, including collecting the personal information directly from the individual, except where otherwise authorized by *FIPPA*.
- Individuals are informed of the purposes for which their personal information is being collected, the legal authority for collecting it, and the name and contact information of someone at the District who can answer questions about the collection and use of the information.
- Internal and external use and sharing of personal information is limited to what is required and authorized by *FIPPA* or consented to by the individual.
- Personal information is used or disclosed only for the purpose for which it was collected, except with the individual's consent or as otherwise required or permitted by *FIPPA* or other laws.

Securing Personal Information

Personal information is protected by ensuring there are reasonable security safeguards in place which are appropriate to the sensitivity of the information. Such security safeguards shall include consideration of physical security, organizational security and electronic security.

All staff have a duty to protect the privacy and security of personal information collected and used by the District as part of their ongoing employment responsibilities, including complying with the District's privacy policy and procedures.

Training will be provided to all staff to ensure they have the requisite knowledge and to ensure compliance with this procedure and *FIPPA*.

Retention of Personal Information

Personal information will be retained for as long as necessary to satisfy its applicable operational, instructional, financial, and legal needs. Personal information that is no longer required for either administrative, operational, financial, legal, or historical purposes shall be securely destroyed in a confidential manner in accordance with District policies and approved record retention procedures.

Accuracy and Correction

Reasonable efforts shall be made to ensure the accuracy of the personal information that the District collects and uses in the course of performing their duties. Individuals have the right to request the correction of their personal information, and the District will receive and respond to such requests in accordance with *FIPPA* and the District's policies and procedures.

Access to Records

Please refer to Administrative Procedure 258 Access to Records.

Complaints and Inquiries

Questions or complaints about the District's privacy information management practices should be directed to the Privacy Officer at privacy@sd33.bc.ca. Response to all complaints will be in writing.