Context:
The Board of Education is committed to meeting its obligations to protect personal information from unauthorized access, use and disclosure in accordance with the *Freedom of Information and Protection of Privacy Act* (*FOIPPA*), *The School Act* Sections 9 and 79 and Ministerial Order M14-91**.**

Policy Statement:
The Board will hold and provide access to student and all other files in full compliance with the FOIPPA, School Act and Ministerial Orders.

Guiding Principles:
The Board will provide clear written direction on the nature of and access to all files which will:

a. include being open and transparent about the purposes for which personal information may be collected and used by the School District;
b. control the manner in which the School District collects, retains, uses, accesses, discloses and disposes of employee and student personal information;
c. allow any person a right of access to the records in the custody or under the control of the School District subject to limited and specific exceptions as set out in *FOIPPA*;
d. allow individuals, subject to limited and specific exceptions as set out in *FOIPPA*, a right of access to personal information about themselves that is held by the School District;
e. allow individuals a right to request corrections to personal information about themselves that is held by the School District; and
f. provide for independent reviews of decisions made by the School District under *FOIPPA* and the resolution of complaints under the *FOIPPA*.

References:

- Administrative Procedure I – *Personal Information Management and Access* to Board Policy 900
- Administrative Procedure II – *Privacy Breach Response* to Board Policy 900
- Administrative Procedure III – *Privacy Impact Assessments* to Board Policy 900
- Board Policy 501*: Acceptable Use of Technology* and its attendant Administrative Procedure
- School District 69 Personal Information Directory
- SD69 File Management Handbook
- *Freedom of Information and Protection of Privacy Act* https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00
- The *School Act* (Section 9) https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_02#section9 and (section 79 https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_06#section79
- Ministerial Order M14/91 https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m14_91.pdf

Adopted/Amended:
Adopted: 1980.01.23
Amended: 19.85.07.03: 1987.11.25: 1989.01.25: 1991.02.12: 1996.06.18: 2001.02.27**:** Interim Revision September 2010**:** 2020.01.28: 2022.09.13: 2023.06.27

PERSONAL INFORMATION MANAGEMENT AND ACCESS

PURPOSE

The purpose of this administrative procedure is to set out how the District will handle employee and student personal information. This administrative procedure should be read in conjunction with Board Policy 900: Information Management and Access. See Appendix I for definitions.

ROLES AND RESPONSIBILITIES

1. The Superintendent of Schools/CEO is recognized as the Head of the Public Body (or any person to whom the Head has delegated their powers by written instrument).

2. The Secretary Treasurer is recognized as the Privacy Officer for the District and is responsible for:
   a. conducting a privacy audit and self-assessment;
   b. developing a privacy policy;
   c. implementing and maintaining a privacy policy
   d. managing privacy training;
   e. responding to requests for access to and correction of personal information;
   f. working with the Information and Privacy Commissioner in the event of an investigation.

3. The Executive Assistant to the Secretary-Treasurer will provide appropriate supports to the Privacy Officer.

4. Employees must:
   a. complete mandatory privacy and information management training;
   b. not alter, copy, interfere with or destroy personal information, except as required;
   c. not disseminate personal information to anyone not covered by a confidentiality agreement;
   d. practice safeguarding measures to ensure personal information held by the School District is protected from unauthorized access, use and disclosure;
   e. ensure that disclosures of information are made only to those entitled to that information, and.
   f. report privacy beaches to the School District.

COLLECTING PERSONAL INFORMATION

5. The School District has the legal authority to collect personal information that relates directly to and is necessary for its operating programs or activities or as otherwise authorized by statute. Personal information will be collected directly from the individual to whom it pertains, unless another method of collection is authorized by the individual or the statute.

6. When the School District collects personal information about students or families, parents/ caregivers/guardians should be informed of the purpose for which the information is being collected. The parents/caregivers/guardians of a student must authorize the disclosure of personal information for purposes ancilliary to educational programs, such as:
   - newsletter publications;
   - website postings;
   - video conferencing;
   - social media applications;
   - honour roll lists;
   - team rosters;
   - yearbooks.

7. Upon their child's initial enrollment, parents/caregivers / guardians will complete and submit the form entitled Student FOIPPA / Personal Information Consent.

8. Where a parent/caregiver or guardian provides consent, the School District will allow the school to publish student personal information for purposes such as:
   - recognition of achievement;
   - promotion of events;
   - commemoration of school events.

   This authorization is deemed in effect until the student changes or transitions to another school.

9. Parents/caregivers / guardians will have the ability to opt out of providing information that is not directly related to a student's educational program or necessary for the School District's operational activities.

USE OF PERSONAL INFORMATION

10. Personal information will be used for the purpose for which it was collected or for a use consistent with that purpose. Employees should seek clarification from the District Privacy Officer if there is uncertainty as to the confidentiality of the information or they need to access information for a purpose other than why it was collected.

RETENTION AND DISPOSAL OF PERSONAL INFORMATION

11. Personal information must be retained for specific periods of time. See Appendix II for the records retention and disposal schedule.

12. Information management must be dealt with in a responsible, efficient, ethical and legal manner. The following safeguards, though not an exhaustive list, will assist in protecting the privacy of employee and student personal information:

a. security measures, such as encryption or passwords, must be in place for personal information that is electronically stored, printed, or transferred;
b. all mobile devices, including personal devices, that access or store District data must be secured by a password login and have the highest available encryption options;
c. passwords must not be shared nor should anyone login to a system using an username and password that has not been specifically assigned to them;

d. locate screen in such a way that it can't be read by visitors or people passing by;
e. lock the computer screen when away from your desk;
f. paper files should be held in locked storage;
g. personal information should be removed from work areas when not in use; and,
h. paper files, including notes, reports, letters and emails, containinig personal information should be protectively marked as private and confidential.

13. Any personal information that is held electronically and is no longer required for administrative, financial or legal purposes must be deleted in their entirety and data storage devices must be fully erased prior to disposal.

14. Paper files containing employee and student personal information that are due for disposal must be securely shredded.

DISCLOSING PERSONAL INFORMATION

16. Personal information may be disclosed to an external or third party if the individual who is the subject of the information has provided written consent. In the case of a student under the age of thirteen, such consent may be provided by the student's parent/caregiver or guardian.

17. Disclosure of personal information is permitted if the information is immediately necessary for the protection of the health and safety of an employee.

18. Consent is not required from a student or parent/caregiver when information is being disclosed for worker safety. If a plan is developed to protect the health and safety of a worker, which also affects the health and safety of a student, the parent/caregiver will be informed, as per the requirements of the School Act. However, parental approval is not required to develop and implement plans to keep workers safe.

19. Managers and Principals are required to investigate incidents that caused or could have caused injury to an employee, in conjunction with the members of the school or work site's Joint Health and Safety Committee.

20. Incident report forms contain employee personal information and therefore cannot be disclosed to employees outside of the committee, except for the purpose of reporting incident to WorkSafe BC.

21. If student information is used to complete an incident investigation or report, personal identifiers must be removed so that the student is not able to be identified.

ACCESS TO PERSONAL INFORMATION

22. Access to any personal information is based on employment duties requiring such access. Unauthorised access to information about colleagues, friends, or family is not permitted.

23. The School District governs the right of access by an individual to their own personal information and by the public to any information or records in its custody or control.

24. Other school districts, government ministries or law enforcement agencies may have access to personal information where obtaining this information is necessary for the provision of their services.

25. Requests for access to information, including access to personal information, must be made in writing and must provide sufficient detail to enable the School Distrrict, with reasonable effort, to identify the records sought. A record of all such transactions must be kept on file.

STUDENT PERSONAL INFORMATION

26. Access to student records will be in accordance with Board Policy 900: Privacy Management and Accountability and its attendant Administrative Procedure.

27. Routine requests will be handled at the point-of-contact. Formal written requests will be handled by the District Privacy Officer through the office of the Secretary Treasurer.

EMPLOYEE PERSONAL INFORMATION

28. Access to personal information may be gained during normal business hours, upon appointment and is available to:
    a. the employee, in the presence of a supervisory officer, or the appropriate personnel officer;
    b. other parties (e.g. legal counsel of the employee) with the specific written consent of the employee;
    c. appropriate Board employees and/or the Board's legal counsel, subject to the approval of the Superintendent or designate, or the appropriate personnel officer.
    d. the individual, in the presence of the appropriate manager or a designate; and/or,
    e. other parties (e.g. legal counsel for the individual) with the specific written consent of the individual.

FEES

29. When fees are to be levied under the *Freedom of Information and Protection of Privacy Act (FOIPPA)* the rates adopted by the Government of British Columbia, as specified in Schedule 1 (*attached*) of the Regulation 155/2012 under the *FOIPPA*, shall be confirmed as the rates used by the School District. Fees shall not be charged to individuals who are accessing their own personal information. See Appendix III for the fee schedule.

ERRORS OR OMMISSIONS

30. An applicant who believes there is an error or omission in their personal information may request correction of the information in writing to the department responsible for the information. The Manager responsible for collecting and retaining the particular type of record will be responsible for the correction or annotation of the information, in consultation with the District Privacy Officer.

31. Notification of the correction or annotation must be given to any other public body or third party to whom that information has been disclosesd during the one year period before the correction was requested.

32. Any correction, annotation or notification must be documented.

INVESTIGATION OF COMPLAINTS

33. Anyone suspecting or aware of the unauthorized collection, use, access, or disclosure of student or employee information or other protocol set out in this administrative procedure must notify the District Privacy Officer.

34. All employees, volunteers and third parties are expected to adhere to the confidentiality requirements of the School District. Those found to be in violation of this procedure may be subject to disciplinary action.

References*:*

- Board Policy 900: *Privacy Management and Accountability and its attendant Administrative Procedures*
- Board Policy 501*: Acceptable Use of Technology* and its attendant Administrative Procedure
- School District 69 Personal Information Directory
- SD69 File Management Handbook
- *Freedom of Information and Protection of Privacy Act* https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00
- The *School Act* (Section 9) https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_02#section9
- And (section 79 https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_06#section79
- Ministerial Order M14/91 https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m14_91.pdf

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Appendix 1 – Definitions

Personal information	Any information that is about an identifiable individual. Personal information may include data such as unique identifiers (social insurance number, school records, contact numbers, gender, medical history, education, employment, psychiatric history, behavioural assessments, personnel evaluations, digital images, audio and video recordings, racial or ethnic origins, sexual orientation or religious beliefs.
Contact information	This enables an employee to be contacted at work and includes the name, position, business contact number, business address and business email.
Employee personal information	This is any recorded information about an identifiable employee (see personal information above) other than contact information.
Student personal information	This includes personal information (defined above) plus any information that identifies a student include a student's name, address, contact number, personal education number (PEN), assessments, results, and educational records.
Record	A record is defined as all recorded information in the custody or control of the School District regardless of physical format, which is collected, created, deposited or held by or in the School District. Records include books, documents, maps, drawings, photographs, letters, paper or any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means.

Appendix II – Records Retention and Disposal Schedule

The principal of the school or the supervisor of the department responsible for the records is authorized to destroy the records in accordance with the following schedule. Records may be maintained beyond the scheduled time if the principal or supervisor believes that they have a further use or historical or archival value.

The following retention schedule outlines the minimum amount of time that School District 69 records must be retained:

Board Records

Board policy	Permanent
Agendas of regular, in-camera and special board meetings	Permanent
List of electors	2 years after the year of creation
Minutes	Permanent
Notice of meetings	1 year
Oaths and declaration of trustees	Selected Retention
School trustees list	While current
Debenture and bylaw register	Permanent
Debenture and coupons redeemed	6 years after year redeemed
Annual Report as required by the School Act	Permanent
District publications and newsletters	Selected Retention

Information and Privacy

Freedom of Information requests	2 years after the calendar year of creation
Requests to review Freedom of Information decisions	5 years after investigation, review, inquiry or adjudication is complete and order has been issued
Freedom of Information requests to correct personal information	2 years after the personal information has been updated, annotated, or request has been transferred to another public body

Financial Records

Annual budget and summary supporting documents	Permanent
Auditor's reports	Permanent
Cancelled cheques	6 years after year of creation
Cheque duplicates, invoices, requisitions	6 years after year of creation
Purchase orders	2 years after year of creation
Employee travel claims	6 years after year of creation

Ministry of Education financial information reports	Permanent
General ledger	Permanent
Invoices billed	6 years after year of creation
Subsidiary ledgers and journals	6 years after year of creation
Receipts issued	6 years after year issued
Bank statements, debit and credit notes	6 years after year of creation
Deposit books	6 years after year of creation
Loans, authorization	6 years or term of loan, if longer
Loans, cancelled notes	6 years after year of creation
Stop payment orders	1 year after year of creation

Facilities Records

Rental of facilities	1 year after year of rental
Appraisal and inventory records	6 years after year of asset disposal
Authorization for expenditure of capital funds	6 years after year capital plan completed
Building plans and specifications (with related change, guarantees, bonds liens and valuable correspondence)	6 years after year of asset disposal
Land titles, deeds and plans	Permanent
Leases	6 years after expiration of term

General Records

General correspondence	2 years after year of creation

Human Resource Records

Applications	1 year after position is filled
Job Competitions	Selected Retention
Collective Agreements with unions	Permanent
Contracts with individual employees	20 years after the year employment ceases
Teacher-on-Call files	5 years after the year employee leaves district
Individual grievance files	Permanent
Letters of discipline	20 years after the year employment ceases
Personnel file	20 years after the year employment

	ceases
Seniority lists	Permanent
Unsolicited resumes	6 months
Violence incident reports	6 years after year of creation
Employee medical file	20 years after the year employment ceases
Information Systems	
User ID's	When user is removed from the system
Insurance Records	
Incident Reports	2 years or until finalized
Claims	6 years after claim settled for adults; 2 years after age of majority is reached for individuals under 19 years
Insurance policies	While current
Payroll Records	
Employee payroll files	20 years after the year employee leaves district
Employee payroll register	20 years after the year employee leaves district
Employee attendance records	6 years after the year employment ceases
Purchasing Records	
Quotations and relative correspondence	6 years after year of creation
Purchasing contracts	6 years after year of creation
Requisitions and purchase orders	6 years after year of creation
Student Records	
Permanent Record - Form 1704 (MyEdBC) - A minimum of the two most recent years of student Progress Reports OR An official copy of the Transript of Grades	55 years after graduation or withdrawal
Attendance reports and registers	Permanent
Out-of-boundary attendance requests	2 years after decision is made
Provincial scholarships and district awards	Permanent
Teachers' student files	While current

Other student records	Useful life of record

Transportation Data

Student bus registration forms	1 year after year of creation
Transportation assistance forms	1 year after year of creation
School bus behaviour report	1 year after year of creation
School bus video tapes	1 year after year of creation as needed
Vehicle maintenance forms	life of bus
Pre-trip forms	3 months
Driver time logs	6 months

Health and Safety Records

References refer to the applicable part from the WCB Occupational Health and Safety Regulation and/or the Workers Compensation Act.

Topic	Type of Records	Reference	Length of time	Springhill	Board Office	Worksite /School
Asbestos	• inventory of asbestos containing materials • risk assessments • inspections • air monitoring	6.32(1)	10 years			x
	• corrective actions to control the release of asbestos fibres • written work procedures • written notification to WorkSafeBC of abatement works • training and instruction of workers	6.32	3 years 6 years	x	 x	
Automotive Lifts and Hoists	• inspection reports • maintenance and testing	12.78	while equipment in use			x
Biohazardous Material	• worker exposures • investigation reports	5.59(3)	length of employment plus 10 years		x	
	• worker education and training	6.41	6 years		x	
Competency of equipment operators		16.4	length of employment		x	
Cranes and Hoists	• inspection reports • maintenance	14.14	while equipment in use			x

Topic	Type of Records	Reference	Length of time	Springhill	Board Office	Worksite /School
Elevated Work Platforms	• inspection Reports • maintenance • repairs • modifications	13.163	while equipment in use	x		
Fire Fighting Equipment	• tests • inspections	31.9	while in use			x
First Aid	• injury or illness report	3.19	3 years			x
Hazardous Substances	• inventory	5.98(1)	while in use			x
	• exposure reports • investigation reports	5.59(3)	length of employment plus 10 years		x	
Incident Investigation Reports		WC Act	6 years			x
Joint Health and Safety Committee Meetings	• meeting minutes	WC Act	2 years			x
Lead	• risk assessments	6.68	while current			X
	• worker exposure report • health monitoring • worker training	6.68	length of employment plus 10 years		x	
Noise	• hearing test for each worker working in a noise environment	7.8	length of employment plus 10 years		x	
	• noise exposure measurement results	7.8 (2)	while equipment in use			x
Radiation	• surveys	7.43	10 years			x
Workplace Inspections		WC Act	1 year			x

APPENDIX III

Schedule 1
Schedule of Maximum Fees
As per BC Reg. 155/2012 (O.C. 591/2012)

Item	Column 1	Column 2
	Description of Services	**Management Fees**
1	For applicants other than commercial applicants:	
	(a) for locating and retrieving a record	$7.50 per 1/4 hour after the first 3 hours
	(b) for producing a record manually	$7.50 per 1/4 hour
	(c) for producing a record from a machine readable record from a server or computer	$7.50 per 1/4 hour for developing a computer program to produce the record
	(d) for preparing a record for disclosure and handling a record	$7.50 per 1/4 hour
	(e) for shipping copies	actual costs of shipping method chosen by applicant
	(f) for copying records	
	(i) floppy disks	$2 per disk
	(ii) CDs and DVDs, recordable or rewritable	$4 per disk
	(iii) computer tapes	$40 per tape, up to 2 400 feet
	(iv) microfiche	$3 per fiche
	(v) microfilm duplication	$25 per roll for 16 mm microfilm, $40 per roll for 35 mm microfilm
	(vi) microfiche or microfilm to paper duplication	$0.50 per page (8.5" x 11")
	(vii) photographs, colour or black and white	$5 to produce a negative
		$12 each for 16" x 20" photograph
		$9 each for 11" x 14" photograph
		$4 each for 8" x 10" photograph
		$3 each for 5" x 7" photograph
	(viii) photographic print of textual, graphic or cartographic record, black and white	$12.50 each (8" x 10")
	(ix) dot matrix, ink jet, laser print or photocopy, black and white	$0.25 per page (8.5" x 11", 8.5" x 14" or 11" x 17")
	(x) dot matrix, ink jet, laser print or photocopy, colour	$1.65 per page (8.5" x 11", 8.5" x 14" or 11" x 17")
	(xi) scanned electronic copy of a paper record	$0.10 per page
	(xii) photomechanical reproduction of 105 mm cartographic record/plan	$3 each
	(xiii) slide duplication	$0.95 each
	(xiv) audio cassette tape (90 minutes or fewer) duplication	$5 per cassette plus $7 per 1/4 hour of recording
	(xv) video cassette recorder (VHS) tape (120 minutes or fewer) duplication	$5 per cassette plus $7 per 1/4 hour of recording
2	For commercial applicants for each service listed in Item 1	the actual cost to the public body of providing that service

PRIVACY BREACH RESPONSE

PURPOSE

The Board of Education of School District No. 69 ("School District") is committed to ensuring the protection and security of all personal information within its control. That commitment includes responding effectively and efficiently to privacy breach incidents that may occur. The purpose of this Procedure is to set out the School District's process for responding to significant privacy breaches and to comply with its notice and other obligations under the Freedom of Information and Protection of Privacy Act (FIPPA).

Responsibilities of Staff

a. All Staff must without delay report all actual, suspected or expected Privacy Breach incidents of which they become aware in accordance with this Procedure. All Staff have a legal responsibility under FIPPA to report Privacy Breaches to the Head.

b. Privacy Breach reports may also be made to the Privacy Officer, who has delegated responsibility for receiving and responding to such reports.

c. If there is any question about whether an incident constitutes a Privacy Breach or whether the incident has occurred, Staff should consult with the Privacy Officer.

d. All Personnel must provide their full cooperation in any investigation or response to a Privacy Breach incident and comply with this Procedure for responding to Privacy Breach incidents.

e. Any member of Staff who knowingly refuses or neglects to report a Privacy Breach in accordance with this Procedure may be subject to discipline, up to and including dismissal.

Privacy Breach Response

Step One – Report and Contain

a. Upon discovering or learning of a Privacy Breach, all Staff shall:
   i. Immediately report the Privacy Breach to the Head or to the Privacy Officer.
   ii. Take any immediately available actions to stop or contain the Privacy Breach, such as by:
      - isolating or suspending the activity that led to the Privacy Breach; and
      - taking steps to recover Personal Information, Records or affected equipment.
   iii. preserve any information or evidence related to the Privacy Breach in order to support the School District's incident response.

b. Upon being notified of a Privacy Breach the Head or the Privacy Officer in consultation with the Head, shall implement all available measures to stop or contain the Privacy Breach. Containing the Privacy Breach shall be the first priority of the Privacy Breach response, and all Staff are expected to provide their full cooperation with such initiatives.

Step Two – Assessment and Containment

a. The Privacy Officer shall take steps, in consultation with the Head, to contain the Privacy Breach by making the following assessments:
   ii. the cause of the Privacy Breach;
   iii. if additional steps are required to contain the Privacy Breach, and, if so, to implement such steps as necessary;
   iv. identify the type and sensitivity of the Personal Information involved in the Privacy Breach, and any steps that have been taken or can be taken to minimize the harm arising from the Privacy Breach;
   v. identify the individuals affected by the Privacy Breach, or whose Personal Information may have been involved in the Privacy Breach;
   vi. determine or estimate the number of affected individuals and compile a list of such individuals, if possible; and,
   vii. make preliminary assessments of the types of harm that may flow from the Privacy Breach.

b. The Head, in consultation with the Privacy Officer, shall be responsible to, without delay, assess whether the Privacy Breach could reasonably be expected to result in significant harm to individuals ("Significant Harm"). That determination shall be made with consideration of the following categories of harm or potential harm:
   i. bodily harm;
   ii. humiliation;
   iii. damage to reputation or relationships;
   iv. loss of employment, business or professional opportunities;
   v. financial loss;
   vi. negative impact on credit record,
   vii. damage to, or loss of, property,
   viii. the sensitivity of the Personal Information involved in the Privacy Breach; and
   ix. the risk of identity theft

Step Three – Notification

a. If the Head determines that the Privacy Breach could reasonably be expected to result in Significant Harm to individuals, then the Head shall make arrangements to:
   i. report the Privacy Breach to the Office of the Information and Privacy Commissioner; and
   ii. provide notice of the Privacy Breach to affected individuals, unless the Head determines that providing such notice could reasonably be expected to result in grave or immediate harm to an individual's safety or physical or mental health or threaten another individual's safety or physical or mental health.

b. If the Head determines that the Privacy Breach does not give rise to a reasonable expectation of Significant Harm, then the Head may still proceed with notification to affected individual if the Head determines that notification would be in the public interest or if a failure to notify would be inconsistent with the School District's obligations or undermine public confidence in the School District.

c. Determinations about notification of a Privacy Breach shall be made without delay following the Privacy Breach, and notification shall be undertaken as soon as reasonably possible. If any law enforcement agencies are involved in the Privacy Breach incident, then notification may also be undertaken in consultation with such agencies.

Step 4 - Prevention
The Head, or the Privacy Officer in consultation with the Head, shall complete an investigation into the causes of each Breach Incident reported under this Procedure, and shall implement measures to prevent recurrences of similar incidents.

References*:*

- Board Policy 900: *Privacy Management and Accountability*
- Administrative Procedure I – *Personal Information Management and Access* to Board Policy 900
- Administrative Procedure III – *Privacy Impact Assessments* to Board Policy 900
- Board Policy 501*: Acceptable Use of Technology* and its attendant Administrative Procedure
- School District 69 Personal Information Directory
- SD69 File Management Handbook
- *Freedom of Information and Protection of Privacy Act* https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00
- The *School Act* (Section 9) https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_02#section9
- And (section 79 https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_06#section79
- Ministerial Order M14/91 https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m14_91.pdf

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PRIVACY IMPACT ASSESSMENTS

PURPOSE

The Board of Education of Qualicum School District ("School District") is responsible for ensuring that it protects the Personal Information within its custody and control, including by complying with the provisions of the Freedom of Information and Protection of Privacy Act ("FIPPA"). FIPPA requires that the School District conduct a Privacy Impact Assessment ("PIA") to ensure that all collection, use, disclosure, protection and processing of Personal Information by the School District is compliant with FIPPA.

A Privacy Impact Assessment (PIA) is an in-depth review of any new or significantly revised initiative, project, activity or program to ensure that it is compliant with the provisions of FIPPA, to identify and mitigate risks arising from the initiative and to ensure that the initiative appropriately protects the privacy of individuals.

The purpose of this Procedure is to set out the School District 's process for conducting PIAs in accordance with the provisions of FIPPA.

RESPONSIBILITIES OF ALL EMPLOYEES

Any Employees responsible for developing or introducing a new or significantly revised Initiative that involve or may involve the collection, use, disclosure or processing of Personal Information by the School District must report that Initiative to the Privacy Officer at an early stage in its development.

All Employees involved in a new or significantly revised Initiative will cooperate with the Privacy Officer and provide all requested information needed to complete the PIA.

All Employees will, at the request of the Privacy Officer, cooperate with the Privacy Officer in the preparation of any other PIA that the Privacy Officer decides to perform.

THE ROLE OF THE RESPONSIBLE EMPLOYEE

(responsible for overseeing the initiative, i.e. District Principal, IT)

Responsible Employees are responsible for:

a. ensuring that new and significantly revised Initiatives for which they are the Responsible Employee are referred to the Privacy Officer for completion of a PIA;
b. supporting all required work necessary for the completion and approval of the PIA;
c. being familiar with and ensuring that the Initiative is carried out in compliance with the PIA; and,
d. requesting that the Privacy Officer make amendments to the PIA when needed and when significant changes to the initiative are made.

INITIATIVES INVOLVING THE STORAGE OF PERSONAL INFORMATION OUTSIDE OF CANADA

a. Employees may not engage in any new or significantly revised Initiative that involves the storage of Personal Information outside of Canada until the Privacy Officer has completed and the Head has approved a PIA and any required Supplemental (or enhanced) Review.

b. The Responsible Employee or Department may not enter into a binding commitment to participate in any Initiative that involves the storage of Personal Information outside of Canada unless any required Supplemental Review has been completed and approved by the Head.

c. It is the responsibility of the Privacy Officer to determine whether a Supplemental Review is required in relation to any Initiative, and to ensure that the Supplemental Review is completed in accordance with the requirements of FIPPA.

d. The Head is responsible for reviewing and, if appropriate, approving all Supplemental Reviews and in doing so must consider risk factors including:
   i. the likelihood that the Initiative will give rise to an unauthorized, collection, use, disclosure or storage of Personal Information;
   ii. the impact to an individual of an unauthorized collection, use, disclosure or storage of Personal Information;
   iii. whether the Personal Information is stored by a service provider;
   iv. where the Personal Information is stored;
   v. whether the Supplemental Review sets out mitigation strategies proportionate to the level of risk posted by the Initiative.

e. Approval of a Supplemental Review by the Head shall be documented in writing.

References*:*

- Board Policy 900: *Privacy Management and Accountability*
- Administrative Procedure I – *Personal Information Management and Access* to Board Policy 900
- Administrative Procedure II – *Privacy Breach Response* to Board Policy 900
- Board Policy 501*: Acceptable Use of Technology* and its attendant Administrative Procedure
- School District 69 Personal Information Directory
- SD69 File Management Handbook
- *Freedom of Information and Protection of Privacy Act* https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00
- The *School Act* (Section 9) https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_02#section9
- And (section 79 https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_06#section79
- Ministerial Order M14/91 https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m14_91.pdf

Adopted/Amended:
Adopted: 2023.06.27
Amended:

QUALICUM SCHOOL DISTRICT

APPENDIX IV

CATEGORIES OF RECORDS AVAILABLE WITHOUT A REQUEST

Freedom of Information and Protection of Privacy Act – Section 71

Category	Location	Nature of Information	Targeted Release Date*
Annual Budget and Financial Statements	Financial information	Information prepared under Budget Transparency and Accountability Act and Financial Information Act	Budget - on or before June 30 Financial Statements - by September 30
Board of Education Bylaws and Policies	Policy manual	Governance guidelines	Following Board approval
Board of Education Public Meeting Agendas, Minutes and Materials	Meetings and Minutes	Materials related to public Board meetings	Upon ratification/ receipt by the Board
Climate Change Accountability Report	CCAR reporting	Summarizes GHG emissions profile in accordance with Climate Change Accountability Act	Following receipt by Board on or before May 31
Executive Compensation Disclosure Report	Financial information	Details of CEO compensation and next 4 highest ranking/paid executives	Following Board approval on or before September 30
Framework for Enhancing Student Learning (FESL) Report	Planning Documents - FESL	Formalizes planning and reporting expectations for all school districts	Following Board approval on or before September 30
Heating and Ventilation Reports	HVAC reports	School level ventilation system reports per Ministry of Education	Following receipt by Board
Lead in Water Testing reports	Water testing reports	Testing of lead in water per Ministry of Health guidelines	Following receipt by Board
Long Term Facility Plan	Facility Planning	District wide framework for capital investment decisions	Following Board approval
Multi Year Financial Plan	Financial information	District wide framework for financial and capital planning	Following Board approval
Strategic Plan	Planning Documents - Strategic Plan	Maintains the Districts core values	Following Board approval
School Calendar	Calendar	Annual District Calendar (Locally developed)	Following Board approval
Statement of Financial Information (SOFI)	Financial information	Information prepared under Financial Information Act	On or before December 31
Support Staff Collective Agreement	Support Staff	Collective Agreements for support staff	Following ratification
Teacher Staff Collective Agreement	Teachers MATA	Collective Agreements for teachers	Following ratification

*The School District endeavors to post the above listed categories within the listed timeframes. However, more time may be needed in some circumstances.