

Title: Privacy

Policy Statement:

Trinity Christian School Association is committed to protecting the privacy of individual employees, students and guardians. To that end, the Board has implemented a privacy program to meet its privacy goals.

Approved: M. Lynn Gullackson
(Chair of the Board)

2008
(Date)

First Approval Date: 2008

To Be Reviewed: May 2020

Review and Amendment Date(s): April 25, 2018

Stakeholders Consulted (Date): April 17, 2018

Referenced Documents:

Alberta Education Electronic Waybill XML Specification PASI
The Privacy Information Protection Act
Freedom of Information and the Protection of Privacy (FOIP) Act of Alberta

Principles:

The Board is committed to protecting the confidentiality of personal information in its custody or under its control in compliance with the applicable federal or provincial legislation.

Definitions:

The ***Privacy Information Protection Act (PIPA)*** is Alberta's private sector privacy law. PIPA applies to non-profit organizations for the protection of personal information and to provide a right of access to an individual's own personal information. Organizations that are subject to PIPA must develop and follow policies that are reasonable to meet its obligations under the Act.

The ***Provincial Approach to Student Information (PASI)*** is Alberta Education's system that is responsible for collecting student course marks submitted by Alberta schools and authorities. The PASI core then takes these students course marks to calculate official marks and eligibility towards credentials.

Alberta Education's ***SharePoint*** system is a file transfer system hosted by Alberta Education for the purpose of exchanging confidential files between its branches and public and independent schools.

Principal means a principal as defined in the School Act, a superintendent or designee in respect to fulfilling obligations under section 113 of the School Act, or for purposes of making recommendations under the Certification of Teachers Regulation.

Privacy Information Officer means an employee who oversees all ongoing activities related to the development, implementation, maintenance of, and adherence to the

Association's policies and procedures covering the privacy of, and access to, personal information in compliance with federal and provincial laws

A. Legislative Requirements:

1. TCSA is bound by the requirements of PIPA and collects, uses or discloses personal information in accordance with its provisions.
2. Alberta Education's PASI system and SharePoint are the primary means by which student enrolment figures and related information is passed by Trinity Christian School Association to Alberta Education. It is under the custody and control of Alberta Education for the purposes of the *Freedom of Information and the Protection of Privacy (FOIP) Act of Alberta*.
3. TCSA is bound by the provisions and requirements of the *PASI User Agreement* signed between the Board and Alberta Education.
4. TCSA, in response to Alberta Education requirements regarding PIPA, recognises the requirement for a Privacy Information Officer to oversee the handling of Student Information for the Association.

B. Guidelines:

1. This privacy policy applies to:
 - a. TCSA employees and volunteers providing services on behalf of the Association.
 - b. Any personal information that identifies an individual, in whatever form or medium (paper, digital, audiovisual, graphic) created or received in the course of carrying out TCSA's mandated functions and activities, and;
 - c. All facilities and equipment required to collect, manipulate, transport, transmit, or keep either TCSA or Alberta Education information.
2. TCSA must collect personal information only for reasonable business purposes and with the consent of the individual or authorized representative, except where otherwise authorized by legislation.
3. TCSA must only use, disclose and retain personal information for purposes consistent with the purpose for which it was collected. Use or disclosure for other purposes is by consent of the individual or authorized representative, or as authorized by legislation.
4. TCSA must make all reasonable efforts to ensure that personal information collected, used or disclosed by or on behalf of the Association is accurate and complete.
5. TCSA must protect personal information in its custody and control by deploying security measures and practices to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction.
6. The Principal will appoint a *Privacy Information Officer* to be responsible for implementing the privacy program and ensuring compliance with legislation.
7. The Privacy Information Officer is to ensure the following, in accordance with the requirements of PIPA;
 - a. Gather private information only as required by The Minister for administration of education.

- b.** Retain private information and dispose of private information as outlined in Student Records regulation.
 - c.** Manage and police access to digital data that TCSA creates, as well as the digital data generated and administered within PASI.
 - d.** Deliver digital information to the Trinity administration to fulfill the above.
 - e.** Train new employees on the importance of following PIPA guidelines.
 - f.** Protect access to data through the measures suggested through PIPA training.
 - g.** Report to the Principal the success of PIPA compliance and formulate suggestions for improvements, if needed.
- 8.** An employee may only access PASI if:
 - a.** the scope of work they are assigned requires PASI access.
 - b.** the Privacy Information Officer makes a recommendation to the PASI administrator to grant access, within the applicant's scope of work.
- 9.** The Privacy Information Officer should train new staff in procedures to assure digital privacy, including protection of passwords.
- 10.** The Privacy officer must identify the purposes for which personal information is collected.
- 11.** The policy requirements for the Privacy Information Officer responsibilities must be reviewed as necessary.
- 12.** Individuals have the right to access information about them at TCSA, subject only to limited and specific exceptions.
- 13.** Individuals who believe there is an error or omission in their personal information have a right to request correction or amendment of the information.
- 14.** Individuals are encouraged to bring any concerns or issues regarding privacy at TCSA to the Privacy Officer for discussion and response. Individuals may appeal to the Information and Privacy Commissioner of Alberta to review or investigate TCSA right of Access or correction responses, or any policies or practice that they feel do not comply with legislative requirements.