

SCHOOL DISTRICT 54
(Bulkley Valley)
ADMINISTRATIVE PROCEDURES

PRIVACY FOR PERSONAL INFORMATION & STUDENT RECORDS
Administrative Procedure 6.920-1
(Policy 6.920)

BACKGROUND

The School District is committed to ensuring the privacy, confidentiality and security of all personal information that it collects, uses, discloses and maintains in connection with its programs and activities. The School District complies with the *School Act* and the *Freedom of Information and Protection of Privacy Act* in relation to all School Records and Student Records.

These procedures support the Policy 6.920 Privacy for Personal Information & Student Records in order to set out specific the School District's commitment, standards and expectations regarding the appropriate use, protection and retention of personal information and School Records.

PRINCIPLES

1. School District Staff:
 - follow responsible information management practices to ensure that the School District collects, uses and discloses personal information in compliance with FIPPA and other applicable laws;
 - seek at all times to protect personal information against unauthorized collection, use and disclosure;
 - facilitate the appropriate release of records within its custody or control in response to access requests received from members of the community under FIPPA; and
 - support timely access by individuals to their own personal information within the School District's custody and control in accordance with the provisions of FIPPA and the *School Act* and this Procedure.

PRIVACY AND CONFIDENTIALITY OF STUDENT RECORDS

2. The School District protects the privacy and maintains the confidentiality of Student personal information and Student Records and expects all Staff to follow responsible information management practices to ensure that the School District fully complies with its obligations under FIPPA, the *School Act* and other applicable laws in relation to the storage, retrieval and appropriate use of Student personal information and Student Records.

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3. The School District and Staff respect the privacy and confidentiality of personal information entrusted to them in the course of their duties, and collect, use and disclose personal information only where authorized by FIPPA.

PURPOSES FOR COLLECTING PERSONAL INFORMATION

4. The School District communicates the purposes for which personal information is collected at or before the time the information is collected, unless otherwise permitted or required by FIPPA.
5. In the ordinary course of carrying out its programs and activities, the School District collects personal information of its Students:
 - registration, enrollment and transfer of students;
 - to provide and deliver educational programs and services;
 - to accommodate students with special needs;
 - to communicate with parents and students and respond to inquiries or complaints;
 - to prepare and provide reports of student progress;
 - to supervise and ensure the safety of students while at school;
 - to investigate and respond to accidents, safety events, misconduct and similar incidents;
 - to ensure compliance with applicable Board bylaws, policies and other laws; and
 - for other purposes set out in the School Act and other Applicable Laws.

COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION:

6. The School District limits the personal information it collects to information to what is related to and necessary in order to carry out its programs and activities or for other purposes authorized by FIPPA or the School Act.
7. The School District seeks to collect personal information by fair, lawful and transparent means, including by collecting personal information directly from the individual, except where otherwise authorized by FIPPA, the School Act or other Applicable Laws.
8. The School District limits the internal and external use and sharing of personal information to what is required and authorized by FIPPA and the School Act.
9. The School District only uses or discloses personal information for the purpose for which it was collected, except with the individual's consent or as otherwise required or permitted by FIPPA or other Applicable Laws.

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SECURING PERSONAL INFORMATION:

10. The School District protects personal information by ensuring it has 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.
11. All Staff have a duty to protect the privacy and security of personal information collected and used by them as part of their ongoing employment responsibilities, including by complying with the terms of the Policy, and this Procedure.
12. The School District provides training to all Staff to ensure they have the requisite knowledge to ensure compliance with the terms of this Policy and the FIPPA.

RETENTION:

13. The School District is required to establish and maintain a written Student Record for every student in the School District in accordance with the requirements of the School Act and the Orders of the Minister of Education (“Minister”).
14. In accordance with the directions of the Minister, a student’s “Permanent Student Record” is required to be maintained for a period of 55 years.
15. The School District does not seek to retain personal information longer than necessary to satisfy the School District’s applicable operational, instructional, financial and legal purposes or satisfy legally required retention period.
16. 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 Board policies and approved record retention protocols.

ACCURACY AND CORRECTION:

17. The School District shall make reasonable efforts to ensure the accuracy of the personal information that they collect and use in the course of performing their duties.
18. Individuals have the right to request the correction of their personal information, and the School District will receive and respond to such requests in accordance with the FIPPA. Requests for correction of personal information should be directed to the Secretary Treasurer.

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STORAGE OF PERSONAL INFORMATION

19. Staff are responsible for ensuring the secure storage of Student Records and Student personal information.
20. Student personal information and Student Records shall be stored only within Canada, except with consent or where storage outside of Canada is permitted by FIPPA.

DISCLOSURE OF PERSONAL INFORMATION

21. The School District discloses personal information as permitted or required under the School Act and the FIPPA or with consent of affected individuals.
22. The School District shall in accordance with section 79(3) of the School Act and applicable Ministerial Orders permit a person providing health services, social services or other approved support services to access information as necessary to carry out that service.

ACCESS TO INFORMATION:

23. Parents or students may access a Student's school file under the School Act by making a request to the school principal. The School principal will respond to such requests by providing access to the Student file for inspection or a copy of such records in accordance with the School Act.
24. Requests made for records not included in the Student file may be made by submitting an access request under Part 2 of the FIPPA. Such requests may be directed to the Office of the Secretary Treasurer, who is responsible for ensuring that a response is provided in accordance with and in the timelines set out in FIPPA.
25. Parents may have authority to make access requests under FIPPA on behalf of a Student. However, authorization from the Student may be required before a response is provided where required under FIPPA, such as when dealing with a mature minor.
26. The School District reserves the right to charge fees to the provision of records to a person making a request for access, if permitted under FIPPA and other Applicable Laws.

COMPLAINTS AND INQUIRIES

27. Questions or complaints about the School District's information management practices should be directed to the School District Privacy Officer at the school board office.
28. The School District will respond to all complaints in writing.

Adopted November 23, 2021