

Policy Statement

It is the policy of the Keewatin-Patricia District School Board (KPDSB) to conduct all its operations as openly as reasonably possible except where the KPDSB may be restricted from doing so under the Municipal Freedom of Information and Protection of Privacy Act, (MFIPPA), the Personal Information and Protection of Electronic Documents Act (PIPEDA), the Personal Health Information Protection Act (PHIPA) and the Education Act.

Rationale

The KPDSB recognizes the importance of open communication with all its stakeholder groups, while at the same time realizing the need for the protection and privacy of the individuals under its jurisdiction.

The protection of personal information held by the KPDSB is guided by the following principles:

1. Accountability and Responsibility

Under the MFIPPA, the school board is responsible for personal information under its control. The Director of Education and/or designate is accountable for compliance with privacy legislation.

Under the PHIPA, health information custodians are responsible for personal health information in their custody and control and may designate an individual within their school board as an agent to assist with compliance to privacy legislation.

2. Specified Purpose

The KPDSB shall identify the purpose(s) for which personal information is collected, and individuals shall be notified of the purposes and any other information required by law at or before the time personal information is collected.

3. Consent

An individual's informed consent is required for the collection, use, retention, and disclosure of personal information, except where otherwise permitted by law.

4. Limiting Collection

The collection of personal information must be fair, lawful, and limited to that which is necessary for its specified purposes.

5. Limiting Use, Retention, and Disclosure

The use, retention, and disclosure of personal information and confidential records are limited to the specified purpose identified to the individual except where otherwise permitted by law.

6. Accuracy

The KPDSB shall ensure that personal information is accurate, complete, and up-to-date in order to fulfil the specified purposes for its collection, use, disclosure, and retention.

7. Safeguards

Personal information is secured and protected from unauthorized access, use, disclosure, and inadvertent destruction by adhering to safeguards appropriate to the sensitivity of the information.

8. Openness and Transparency

The KPDSB shall make available to the public specific information about its policies and practices relating to the management of personal information.

9. Access and Correction

An individual has the right to access his/her personal information and will be given access to that information in accordance with privacy legislation, subject to any restrictions.

An individual has the right to challenge the accuracy and completeness of the information and request that it be amended, as appropriate, or to have a letter/statement of disagreement retained on file. Any individual to whom the disclosure has been granted in the year preceding a correction has the right to be notified of the correction/statement.

An individual is to be advised of any third-party service provider requests for his/her personal information in accordance with privacy legislation.

10. Compliance

An individual may address or challenge compliance with the above principles to the Director of Education or designate.



Policy Section: **School Administration**

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Policy Name: **Privacy and Information Management**

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Cross Reference:
MFIPPA / PIPEDA / PHIPA
Human Resources Manual
Policy 301, Police Initiated Interviews with Students
Policy 302, Search and Seizure in the Schools
Policy 315, Voluntary & Confidential Self-Identification for First Nation, Métis & Inuit Students
706, Employee Code of Conduct
Procedure 318, Privacy and Information Management

Date Approved: April 10, 2001
Reviewed: Mar9/04; Feb2007; May 14/13; May 12/15

Date Revised; May 14, 2019

Review by: 2022



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Records Information Management

All staff shall be responsible and accountable for creating and maintaining accurate business records within their control in accordance with the KPDSB Privacy and Information Management procedure. All records and information received, created, and maintained within administrative departments and schools are the property of the KPDSB and subject to this policy.

This policy applies to:

- All records within the custody or under the control of the KPDSB regardless of the medium in which those records are stored and maintained;
- All business applications and information technology systems used to create, store, and manage records and information including email, database applications, and websites; and,
- All KPDSB staff and third party contractors or agents who collect or receive records and information on behalf of the KPDSB.

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