
POLICY 1161

FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY

Adopted: September 26, 2016

Revised: June 19, 2023

Frequency of Review: Annual

1.0 RATIONALE

- 1.1 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 must comply with the School Act and the Freedom of Information and Protection of Privacy Act in relation to the protection of privacy. This Policy sets out the School District's commitment, standards and expectations regarding the appropriate practices for the collection, use and protection of personal information.
- 1.2 Transparency and Accountability: The School District strives to be open and transparent with the community about its programs and activities, and has processes in place to support the timely response to access requests submitted under FIPPA and the proactive release of information of interest to the community.
- 1.3 Privacy Related Complaints: The School District will respond to and, where appropriate, investigate, all complaints that it receives under this Policy concerning its personal information management practices.

2.0 DEFINITIONS

- 2.1 "Personal Information" means recorded information about an identifiable individual, but does not include an individual's business contact information (business address, email address, telephone number);
- 2.2 "FIPPA" means the BC Freedom of Information and Protection of Privacy Act;
- 2.3 "Regulations" means the Administrative Regulations to this Policy;
- 2.4 "Staff" refers to all employees of the School District who are required to comply with FIPPA and all relevant School District policies and regulations;
- 2.5 "Contractors" refers to a service provider retained under a contract to perform services for the School District. Contractors are required to comply with FIPPA and all relevant School District policies and regulations;

- 2.6 “Volunteers” refers to community members carrying out volunteer activities on behalf of the School District. Volunteers are required to comply with FIPPA and all relevant School District policies and regulations.

3.0 POLICY STATEMENT

- 3.1 The School District and all Staff, Contractors, and Volunteers, shall uphold the privacy, confidentiality and appropriate use of personal information in compliance with the School Act, FIPPA and the Regulations, including by:
- 3.2 being open and transparent about the purposes for which personal information may be collected and used by the School District;
- 3.3 collecting and using personal information only as necessary to carry out the School District’s authorized programs and activities;
- 3.4 sharing personal information internally with Staff only on a need-to-know basis;
- 3.5 sharing personal information with third parties with the knowledge and consent of affected individuals, unless otherwise authorized or required under FIPPA, the School Act or other applicable laws;
- 3.6 ensuring personal information is protected against unauthorized access, use, disclosure, loss or destruction; and
- 3.7 complying with FIPPA and all Regulations for the accuracy, protection, use, disclosure, storage, retrieval, correction and appropriate use of personal information.

4.0 RESPONSIBILITIES

- 4.1 The **Superintendent** has been designated by the Board of Education as the “head” of the School District for the purposes of FIPPA, and has overarching responsibility for ensuring compliance with this Policy, FIPPA and the requirements of the School Act pertaining to student records.
- 4.2 The **Secretary Treasurer** and the **Director of IT for Learning** have been designated as the **Privacy Officers** responsible for:
- 4.2.1 being points of contact for privacy-related matters such as privacy questions or concerns;
- 4.2.2 supporting the development, implementation, and maintenance of privacy policies and/or regulations; and
- 4.2.3 supporting Greater Victoria School District’s compliance with FIPPA.

5.0 REFERENCES

- i. Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996
- ii. Freedom of Information and Protection of Privacy Regulation
- iii. School Act, R.S.B.C. 1996, c. 412 sections 9, 79(3)

iv. Student Records Disclosure Order (M14/91)