

# POLICY 611: PRIVACY - PRIVACY IMPACT ASSESSMENTS

## ADMINISTRATIVE PROCEDURES

### 1. PURPOSE

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

A Privacy Impact Assessment is an in-depth review of any new or significantly revised initiative, project, activity or program that involves Personal Information. The assessment is required to ensure the use of Personal Information is compliant with the provisions of FIPPA, to identify and mitigate risks arising from the initiative, and to ensure 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.

### 2. SCOPE & RESPONSIBILITY

This Procedure applies to all new and significantly revised Initiatives of the School District.

All Staff of the School District are expected to be aware of and follow this Procedure in the event they are involved in a new or significantly revised Initiative.

Departments and management staff are responsible to plan and implement new or significantly revised Initiatives in accordance with the requirements of this Procedure.

### 3. DEFINITIONS

- a. **“Head”** means the Secretary Treasurer of the School District or any person to whom the Secretary Treasurer has delegated their powers under this Procedure.

**“Initiative”** means any enactment, system, project, program or activity of the School District.

**“Personal Information”** means any recorded information about an identifiable individual that is within the control of the School District and includes information about any student or any Staff of the School District. Examples include:

- Name, address, phone number, personal email address
- Image (picture or video)

- Date of birth, grade, school
- Race, national/ethnic origin
- Religious or political beliefs or associations
- Age, sex, sexual orientation, marital status
- Fingerprints, blood type, DNA information, biometrics
- Health care, educational, financial, criminal, employment information

Personal Information does not include business contact information, such as business address, email address and telephone number that would allow a person to be contacted at work.

- b. **“PIA”** means a Privacy Impact Assessment performed in accordance with the requirements of FIPPA.
- c. **“Privacy Officer”** means the Secretary Treasurer of the School District or any person to whom the Secretary Treasurer has delegated their powers under this Procedure.
- d. **“Responsible Staff”** means the Department Head or other Staff who is responsible for overseeing an Initiative, and in the event of doubt, means the Staff designated in the PIA as the Responsible Staff;

**“Staff”** means all persons employed or engaged by the School District to carry out its operations and includes independent contractors and volunteers.

- e. **“Supplemental Review”** means an enhanced process for reviewing the privacy and data security measures in place to protect sensitive Personal Information in connection with an Initiative involving the storage of Personal Information outside of Canada.

#### 4. RESPONSIBILITY OF THE HEAD

The Secretary Treasurer has been designated by the Board of Education as the “Head” of the Board for the purposes of FIPPA. As Privacy Officer, the Secretary Treasurer is responsible for the administration of this Procedure and may delegate any of their powers under this Procedure or FIPPA to other Staff by written delegation.

#### 5. RESPONSIBILITIES OF ALL STAFF

- a. Any Staff responsible for developing or introducing a new or significantly revised Initiative that involves or may involve the collection, use, disclosure or processing of Personal Information by the School District must complete and submit a PIA to the Privacy Officer for review and approval **before** moving forward with the Initiative.
- b. All Staff involved in a new or significantly revised Initiative will cooperate with the Privacy Officer and provide all requested information needed to complete the PIA.

- c. All Staff 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.

## **6. THE ROLE OF THE RESPONSIBLE STAFF**

- a. Responsible Staff are responsible for:
  - i. ensuring completed PIAs for new and significantly revised Initiatives for which they are the Responsible Staff are submitted to the Privacy Officer for review;
  - ii. supporting all required work necessary for the completion and approval of the PIA;
  - iii. being familiar with and ensuring the Initiative is carried out in compliance with the PIA; and
  - iv. making amendments to the PIA when needed and when significant changes to the initiative have occurred.

## **7. INITIATIVES INVOLVING THE STORAGE OF PERSONAL INFORMATION OUTSIDE OF CANADA**

- a. Staff 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 approved a PIA and any required Supplemental Review.
- b. The Responsible Staff 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 Privacy Officer.
- 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 the Supplemental Review is completed in accordance with the requirements of FIPPA.
- d. The Privacy Officer is responsible for reviewing and, if appropriate, approving all Supplemental Reviews, and in doing so must consider risk factors including:
  - i. the likelihood 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 Privacy Officer shall be documented in writing.

## **8. CONTACT INFORMATION**

Questions or comments about this Procedure may be addressed to the Privacy Officer at [secretarytreasurer@sd44.ca](mailto:secretarytreasurer@sd44.ca).

## **9. RELATED ACTS AND REGULATION**

*British Columbia School Act*

*British Columbia Freedom of Information and Protection of Privacy Act (FIPPA)*

## **10. SUPPORTING REFERENCES, POLICIES, PROCEDURES AND FORMS**

[Policy 611: Privacy](#)

Policy 611: Personal Information Management Program - Administrative Procedure

Policy 611: Critical Incident and Privacy Breach - Administrative Procedure

Policy 611: Social Media - Administrative Procedure

Privacy Impact Assessment – SD44 Internal Template