

#09 Privacy and Security of Information

BOARD POLICY

Board Approval:	May 28, 2019
Effective Date:	June 1, 2019
Amendment Date:	May 25, 2021
Review Date:	May 31, 2024

PURPOSE

Employees and Representatives of HLG shall be held to high standards of behaviour with respect to the collection, use, disclosure, access and safeguarding of Personal Information.

DEFINITIONS

Board – The Boards of Governors/Directors of HLG.

CEO – The Chief Executive Officer of HLG.

Employee – Employees of HLG.

HLG – Headwater Learning Group, the term for three independent charitable organizations – Calgary Academy Society, Headwater Learning Foundation and Headwater Learning Solutions Foundation.

Operational Days – Work days that are inclusive of both non-instructional days (when Students are not present) and instructional days (when Students are present).

Personal Information – Information about an identifiable individual.

Personal Employee Information – Personal Information reasonably required by HLG for the purposes of establishing, managing or terminating an employment or volunteer work relationship, but not including Personal Information unrelated to that relationship.

PIPA – The Personal Information Protection Act, SA 2003, c. P-6.5.

Principal – The head of school operations.

Privacy Officer – Designate(s) of responsible for ensuring that HLG complies with PIPA.

Privacy Statement – An organizational statement of commitment to the principles of this Policy included or linked to official documentation and information requests.

Representatives – Board Governors/Directors, contractors and service providers of HLG.

Stakeholders – Students, parents, guardians, volunteers, community members, donors, and education, business and industry partners.

GUIDELINES

General

1. HLG is committed to safeguarding and managing Personal Information and Personal Employee Information in accordance with PIPA.
2. HLG will obtain express, deemed or implied consent of individuals, except where consent is not required by law, to collect, use and disclose Personal Information for its reasonable business purposes, which include, but are not limited to, capital campaigns and marketing.
3. In general, the Personal Information of Stakeholders is collected, used and disclosed for the purposes of:
 - a) providing information about HLG and their operations to Stakeholders;
 - b) managing and administering contracts with Stakeholders;
 - c) managing HLG's relationships with, and providing for, the safety of Stakeholders;
 - d) meeting any legal or regulatory requirement or obligation;
 - e) facilitating participation in HLG events; and
 - f) other reasonable purposes consistent with HLG business objectives.
4. HLG endeavours to protect Personal Information and Personal Employee Information by adopting leading industry and international standards
5. HLG will obtain the consent from its Employees, except where consent is not required by law, to collect, use, and disclose Personal Information for purposes unrelated to the employment relationship.
6. A Privacy Statement shall be included on all requests of HLG for personal information, personal employee information, HLG proprietary information and HLG email communications.
7. Personal Information and Personal Employee Information will be retained in accordance with the F-10 Records Retention and Disposal Procedure.
8. Individuals have a right to access and verify their own Personal Information in a record that is in the custody or under the control of HLG, subject to some exceptions. Requests for access to Personal Information is outlined in the Access to Personal Information Procedure.
9. To ensure compliance with PIPA legislation, and expedite remedy of privacy complaints, HLG has appointed the Principal as the Privacy Officer for all Stakeholders (contacted at privacy@calgaryacademy.com). The Privacy Officer for all Employees and Representatives is the Director of HR for HLG (contacted at hrdirector@calgaryacademy.com).
10. Individuals may address any questions or concerns about HLG's compliance with this policy or concerning the individual's Personal Information by contacting the appropriate HLG Privacy Officer.
11. HLG will train all new Employees and Representatives in relation to Privacy and Security and periodically review best practices with existing Employees and Representatives.
12. Privacy Officers are responsible for compliance, addressing complaints, leading training programs, responding to access requests and responding to any questions or concerns.
13. Violations of this policy will result in discipline, up to and including termination of an employment contract for Employees, and reasonable disciplinary measures for Representatives and Stakeholders.

Personal Employee Information

14. Personal Employee Information is collected, used and disclosed for the purpose of establishing, managing or terminating an individual's employment relationship with HLG in accordance with privacy laws.
15. With respect to reference requests, HLG will not disclose Personal Employee Information to other organizations unless it has the consent of the Employee or former Employee.

REFERENCES

Personal Information Protection Act, SA 2003, c. P-6.5

Personal Information Protection Act Regulation, AR 366/2003

Student Record Regulation, Alta Reg 97/2019

ISO Standard 19608 – Guidance for Developing Security and Privacy Functional Requirements

CROSS-REFERENCES

Board Policy – Code of Conduct

A-04 Student Records Processing and Storage Procedure

F-10 Records Retention and Disposal Procedure

F-14 Access to Personal Information Procedure

C-16 Personnel Files Procedure