



#09 Privacy and Security of Information BOARD POLICY

Board Approval: May 28, 2019
Effective Date: June 3, 2019
Amendment Dates: N/A
Review Date: June 3, 2021

PURPOSE

Employees and Representatives of HLG shall be held to high standards of behaviour with respect to the collection, use, disclosure 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. HLG endeavours to protect Personal Information and Personal Employee Information by adopting leading industry and international standards
4. A Privacy Statement shall be included on all HLG requests for personal information, personal employee information, and official HLG brands.
5. Personal Information and Personal Employee Information will only be retained for the period of time that there is a relationship with HLG, compliant with legislation as outlined in Records Retention and Disposal Procedure, or as required for statutory or other legal purposes.
6. 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 Request for Access to Personal Information Procedure.
7. 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).
8. HLG will train all new Employees and Representatives in relation to Privacy and Security and annually review best practices with existing Employees and Representatives.
9. The Privacy Officers are responsible for addressing non-compliance complaints with PIPA this policy, leading training programs consistent with guideline #8, and for responding to any questions or concerns. 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.
10. HLG will train all new Employees and Representatives in relation to Privacy and Security and annually review best practices with existing Employees and Representatives
11. 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

12. Personal Employee Information is collected, used and disclosed for the purpose of establishing, managing or terminating an individual's employment relationship with HLG, which purposes include, but are not limited to:
 - a) ensuring the safety and security of Employee and corporate assets, including confidential, corporate and other business information;
 - b) determining eligibility for initial employment, including the verification of references and qualifications;

- c) administering pay and benefits;
 - d) facilitating professional development and performance;
 - e) complying with applicable employment or legal requirements;
 - f) communicating with Employees; and
 - g) other reasonable purposes as required to manage the employment relationship.
13. 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.
14. HLG will not disclose Personal Employment Information about its Employees or former Employees to other organizations who request references without consent.

Personal Information

15. In general, the Personal Information about 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.

Legal References

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

Personal Information Protection Act Regulation, AR 366/2003

Student Record Regulation

Cross-References

Board Policy – Code of Conduct

Procedure – Records Retention and Disposal

Procedure – Request for Access to Personal Information

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