



DISTRICT PRACTICE 2950.6

PRIVACY IMPACT ASSESSMENTS

DISTRICT PRACTICE:

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

A Privacy Impact Assessment (PIA) is an in-depth review of any new or significantly revised initiative, project, activity, or program to ensure that it is compliant with the provisions of FIPPA, to identify and mitigate risks arising from the initiative and to ensure that the initiative appropriately protects the privacy of individuals.

The purpose of this district practice is to set out the Board’s process for conducting PIAs in accordance with the provisions of FIPPA.

SCOPE AND RESPONSIBILITY

This district practice applies to all new and significantly revised Initiatives of the Board.

All employees of the Board are expected to be aware of and follow this district practice in the event that they are involved in a new or significantly revised Initiative.

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

DEFINITIONS

Where used in this District Practice, the following terms have the following meanings:

- a) “Employees” means the employees, contractors and volunteers of the Board.
- b) “Head” means the Superintendent/CEO of the Board or any person to whom the Superintendent/CEO has delegated their powers under this District Practice.
- c) “Initiative” means any enactment, system, project, program or activity of the Board.
- d) Personal information means any recorded information about an identifiable individual that is within the control of the Board and includes information about any student or any Employee of the Board. Personal Information does not include business contact information, such as email address and telephone number, that would allow a person to be contacted at work.

[POLICY 2950 FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY](#)

REFERENCES

Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c. Part 3; School Act, R.S.B.C. 1996, c. 412 sections 9, 79(3)
Student Records Disclosure Order(M14/91)

ADOPTED: September 12, 2023

Amended:



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- e) “PIA” means a Privacy Impact Assessment performed in accordance with the requirements of FIPPA.
- f) “Privacy Officer” means the Secretary Treasurer who has been designated by the Head as the Privacy Officer for the Board.
- g) “Responsible employee” means the Department Head or other Employee who is responsible for overseeing an Initiative, and in the event of doubt, means the Employee designated in the PIA as the Responsible Employee.
- h) “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.

RESPONSIBILITIES OF THE HEAD

The administration of this district practice is the responsibility of the Superintendent/CEO, who is the “head” of the Board for all purposes under FIPPA. The Head may delegate any of their powers under this district practice or FIPPA to other Board employees by written delegation.

RESPONSIBILITIES OF THE PRIVACY OFFICER

The Privacy Officer is responsible to, in consultation with the Head, ensure that all PIAs and supplemental reviews are completed in accordance with the requirements of FIPPA and this district practice.

RESPONSIBILITIES OF ALL EMPLOYEES

Any employees responsible for developing or introducing a new or significantly revised Initiative that involve or may involve the collection, use, disclosure, or processing of personal information by the Board must report that initiative to the Privacy Officer at an early stage in its development.

All employees involved in a new or significantly revised Initiative will cooperate with the Privacy Officer and provide all requested information needed to complete the PIA.

All employees 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.

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THE ROLE OF THE RESPONSIBLE EMPLOYEE

Responsible Employees are responsible for:

- a) ensuring that new and significantly revised initiatives for which they are the responsible employee are referred to the Privacy Officer for completion of a PIA;
- b) supporting all required work necessary for the completion and approval of the PIA;
- c) being familiar with and ensuring that the initiative is carried out in compliance with the PIA; and
- d) requesting that the Privacy Officer make amendments to the PIA when needed and when significant changes to the initiative are made.

INITIATIVES INVOLVING THE STORAGE OF PERSONAL INFORMATION OUTSIDE OF CANADA

- a) Employees 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 completed and the Head has approved a PIA and any required supplemental review.
- b) The responsible employee 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 Head.
- 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 that the supplemental review is completed in accordance with the requirements of FIPPA.
- d) The Head is responsible for reviewing and, if appropriate, approving all supplemental reviews and in doing so must consider risk factors including:
 - i. the likelihood that 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 Head shall be documented in writing.

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CONTACT INFORMATION

Questions or comments about this Policy may be addressed to the Privacy Officer at PrivacyOfficer@sd6.bc.ca

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REFERENCES

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