



## SCHOOL DISTRICT NO. 57 (PRINCE GEORGE)

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### School District No. 57 Privacy Management Program

The [\*Freedom of Information and Protection of Privacy Act\*](#) (FOIPPA) requires B.C. public bodies to develop a privacy management program (PMP). A PMP is an evolving set of policies, procedures and tools developed by a public body to enable systematic privacy protection throughout the personal information lifecycle.

#### Designated Privacy Contact

The designated Privacy Contact is the point of contact for privacy-related matters, supports development, implementation, and maintenance of privacy policies and/or procedures, and supports compliance with FOIPPA.

School District No. 57 has designated Ellen Bryden, Privacy Compliance and Risk Management Advisor, as their Privacy Contact Person.

#### Privacy Impact Assessments (PIAs) and Information Sharing Agreements (ISAs)

A PIA is a step-by-step review process to make sure that a public body is meeting its privacy requirements under FOIPPA and helps a public body identify and mitigate any privacy risks involved in a particular initiative. An ISA is an agreement that sets the conditions on the collection, use or disclosure of personal information by the parties to the agreement.

School District No.57 has a process in place for completing and documenting PIAs and ISAs. PIAs and ISAs are completed by District staff, are reviewed by the Privacy Compliance and Risk Management Advisor, and are approved by the Secretary Treasurer. PIAs and ISAs are documented and stored by the Curriculum and Innovation Department for use by other staff.

#### Privacy Complaints and Privacy Breaches

A privacy breach is the theft or loss of personal information, or the access, collection, use or disclosure of personal information in the custody or control of a public body that is not authorized by FOIPPA. A privacy complaint is a complaint from an individual about a breach of their own personal information.

School District No.57 has a process in place to respond to any privacy breaches or complaints. Suspected breaches or complaints are reported to a supervisor or member of the Senior Administration team, and are brought to the attention of the privacy contact. The privacy contact investigates the breach or complaint, determines the level of harm and any need for reporting, notifies affected individuals and the Commissioner, works to contain or recover information where applicable, advises on preventative measures that can be put in place to prevent further complaints or breaches, documents complaints and breaches, responds to complaints, and works with the Human Resources Department and Senior Administration team to ensure administrative fairness practices are in place.

### Privacy Awareness and Education Activities

Privacy training and awareness helps employees identify personal information, understand their privacy obligations, and are an important part of breach prevention.

Basic privacy training is part of the School District No. 57 onboarding process for all new employees. Additional training is provided to those with access to personal information in their day to day work. Information regarding privacy awareness is available to all staff through the School District No.57 Staff Dashboard.

### Making Privacy Practices and Policies Available

Public bodies are required to make their privacy policies and any documented privacy processes or practices available to employees and, where practicable, to the public.

School District No.57 includes privacy policies in the [Policies and Procedures](#) portion of the main School District website. Privacy policies, processes, and practices are available to staff through the School District No.57 Staff Dashboard.

### Informing Service Providers of privacy Obligations

When service providers handle personal information related to the provision of services for a public body, the public body must inform them of their privacy obligations. Contracts are one way to demonstrate privacy obligations for service providers. PIAs are another useful tool to demonstrate how public bodies and service providers can meet their privacy obligations.

School District No. 57 includes the designated privacy contact in their process when considering new service providers that may be handling personal information. When applicable wording requiring compliance with FOIPPA is included in any new contract. When applicable a PIA is done on any new program provided by a Service Provider.

### Monitoring and Updating

It is important to review the PMP regularly and ensure it is still relevant to the public body's activities and personal information holdings. For example, this could include an annual review or a review when there is a large change in the public body's operations.

School District No. 57s PMP is regularly reviewed and updated by the designated privacy contact.

For more information on Privacy Management Program requirements please visit the following websites;

[Privacy Management Program Directions](#)

[Privacy Management Program Guidance for B.C. Public Bodies](#)