	Administrative Procedure **Privacy**	
	Department:	**Corporate Services**
	Approved by:	**Leadership Council**
	Date Approved:	**May 13, 2024**
	Revision Date(s):	
	Review Date:	
	External References • *The Freedom of Information and Protection of Privacy Act* (FOIP) • *The Health Information Protection Act* (HIPA) • *The Archives and Public Records Management Act* (APRMA) • Government of Saskatchewan Privacy Manual	
	Internal References • Records Management AP	

Purpose

- This administrative procedure establishes the principles and practices governing the collection, use, disclosure, and protection of personal information by Saskatchewan Distance Learning Centre (Sask DLC).

Scope

- This procedure applies to all individuals who interact with Sask DLC including students, parents, guardians, employees, contractors, practicum students and visitors. It covers the collection, storage, processing and disclosure of personal information obtained through various platforms and services offered by Sask DLC, including but not limited to our website, learning management system and administrative systems.

Policy Statement

- Sask DLC is committed to protecting the privacy and security of personal information collected from students, parents, employees and other stakeholders in accordance with applicable legislation and regulations.

- Collection of Personal Information
  a. Sask DLC may collect personal information from students, parents, employees and stakeholders for educational, administrative, employment or business purposes.
  b. Personal information is collected with the consent of the individual involved or their legal representatives and only necessary for the purpose outlined in this policy.

- Use of Personal Information
  a. Sask DLC will use personal information solely for the purposes for which it was collected. Examples includes: educational, administrative, employment or business purposes.
  b. Personal information will not be used for marketing or advertising purposes without explicit consent.

- Protection of Personal Information
  a. Sask DLC employs appropriate technical and organizational measures to safeguard personal information against unauthorized access, disclosure, alteration or destruction.
  b. Access to personal information is restricted to authorized personnel who require it to perform their duties.

- Data Retention and Disposal
  a. Sask DLC retains personal information for as long as necessary to fulfil the purposes for which it was collected and to comply with legal requirements.
  b. The disposal of personal information will be done securely and in accordance with the established procedures.

- Disclosure of Personal Information
  a. Sask DLC may share personal information with trusted third parties such as educational partners, service providers and regulatory authorities when required by law or to enhance the educational experience, consistent with the relevant legislative authority or with consent. Please refer to *Appendix A – Disclosure of Personal Identifiable Information in Education Applications*.

- Access and Correction
  a. Individuals have the right to access their personal information held by Sask DLC and request corrections when necessary.
  b. Request for access or corrections should be submitted in writing to Sask DLC Privacy Officer or their designate.

Procedures:

1. Consent
   a. Consent for the collection, use and disclosure of personal information is obtained at the time of enrollment, employment or as needed for specific educational, administrative, employment or business purposes.
   b. Consent may be withdrawn at any time, subject to legal and contractual obligations.

2. Data Breach Response
   a. In the event of a data breach, Sask DLC will take immediate action to mitigate any potential harm and will comply with all legal reporting requirements.
   b. Sask DLC has a designated privacy officer responsible for ensuring compliance with this procedure and addressing privacy-related concerns.

3. Privacy Impact Assessments on Purchased Applications
    a. All Sask DLC-purchased applications that are used to collect personal information from students, parents, guardians, and employees must undergo a thorough privacy impact assessment (PIA) process and the results of this assessment must be documented.
    b. Sask DLC will ensure that PIAs conducted on applications purchased by Sask DLC are audited regularly to maintain compliance with privacy regulations and safeguard the privacy of students and staff.

Definitions:

1. **Personal Information:** Refers to any information about an identifiable individual, including but not limited to name, address, contact details, employee identification numbers, health records, financial information, academic records.
2. **Consent:** Refers to voluntary and informed agreement by an individual to the collection and use of their personal information for specific purposes.
3. **Data Breach:** Refers to unauthorized access, disclosure, or loss of personal information, which may result in harms to individuals.

	Appendix A **Disclosure of Personally Identifiable Information in Educational Applications**	
	Department:	**Corporate Services**
	Approved by:	**Leadership Council**
	Date Approved:	**May 13, 2024**
	Revision Date(s):	
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	External References • *The Freedom of Information and Protection of Privacy Act* (FOIP) • *The Health Information Protection Act* (HIPA)	
	Internal References • Privacy AP	

Purpose

- This guideline aims to protect student privacy at Saskatchewan Distance Learning Centre (Sask DLC) by preventing the collection of any personally identifiable information (PII) that is optional or not required in the use of educational applications.

Scope

- This procedure applies to all individuals involved in the selection, implementation, and use of educational applications within Sask DLC.

Policy Statement

- Sask DLC is committed to protecting the privacy and security of personal information collected from students, parents and other stakeholders in accordance with applicable legislation and regulations.
- Sask DLC recognizes the importance of limiting the collection and use of PII to only what is necessary for the purpose of providing education to students. Sask DLC prohibits the entry of optional or not-required PII into applications used for educational purposes.

Procedures:

1. Identification of Applications:
   a. The Information Technology (IT) department, in collaboration with relevant stakeholders, will identify all applications and software utilized for educational purposes within Sask DLC.

2. Review of Data Collection Practices:
   a. The IT department will thoroughly review the data collection practices of each identified application to ascertain the types of PII requested or required for use.
   b. The IT department will document the types of PII requested by each application, distinguishing between optional and required information.

3. Communication and Training:
    a. The IT department will ensure that staff, educators and administrators are informed of the distinction between optional and required PII in applications used for educational purposes.
    b. The Student Programming department will conduct training sessions for educators to ensure understanding and compliance with this procedure.

4. Configuration of Applications:
    a. The IT department when possible will configure applications to minimize the collection and storage of optional PII. Any unnecessary fields requesting optional PII should be disabled or removed from the application interface.

Definitions:

4. **Personally Identifiable Information:** Refers to any information that can be used to identify an individual, including but not limited to name, address, contact details, student and employee identification numbers, health records, financial information, and academic records.
5. **Optional Personally Identifiable Information:** Refers to personally identifiable information that is requested by an application but is not required for the completion of educational tasks or services.
6. **Required Personally Identifiable Information:** Refers to personally identifiable information necessary to complete educational tasks or services.