

PROTECTION OF PRIVACY POLICY			
Effective Date	September 1, 2023	Policy Type	Administrative
Responsibility	Vice-President, Corporate Services	Cross-Reference	<ol style="list-style-type: none"> 1. Records Management Policy 2. Records Classification and Handling Policy 3. Communication Policy 4. IT Email Policy 5. IT Acceptable Use Policy 6. IT Security Policy 7. Records Disposition Policy 8. IT Security Incident Management Policy
Approver	Executive Council	Appendices	
Review Schedule	Every 5 years		

1. Policy Statement

- 1.1 Northwestern Polytechnic ("NWP" or the "Institution") encourages a privacy culture within its operations to meet the expectations of students, parents, and employees and comply with applicable legislation and regulations.

2. Background

- 2.1 NWP collects personal information from students, prospective students, employees, alumni, donors, the Board of Governors, etc.
- 2.2 NWP is defined as a "Public Body" under the *Freedom of Information and Protection of Privacy Act* ("FOIP") and must comply with the requirements of this Act.

3. Policy Objective

- 3.1 The objective of this policy is to advise institution employees of their responsibilities for the management and protection of personal information and to provide guidance in collecting, using, disclosing, and managing personal information in the custody of NWP.

4. Scope

- 4.1 This policy applies to all members of the institution community.

5. Definitions

- 5.1 Members of the "Institution community" includes students, Board of Governors, employees, staff and contractors.
- 5.2 "Personal information" is information related to an individual that can be used to identify, contact, or locate a single person, or to identify an individual in context. This includes an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, religion, ethnic background, health status, financial information (such as banking or credit card information), educational history, and so forth.

6. Guiding Principles

- 6.1 NWP will collect, use, disclose, and manage personal information in accordance with FOIP in Alberta, and other applicable laws, such as the *Health Information Act*.
- 6.2 The Institution is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with this policy, FOIP and other privacy-related legislation.
- 6.3 All members of the Institution community are responsible for the protection of personal, confidential, and sensitive information entrusted to them.
- 6.4 NWP will ensure the Institution community members are aware of its privacy policies and procedures, through publications, web postings, training seminars, and other communication means.
- 6.5 The Institution will only collect personal information when it is necessary for the purposes identified by NWP. Such information shall be collected by fair and lawful means.
- 6.6 NWP will maintain Personal Information Banks of all personal information it houses, as required by FOIP.
- 6.7 The purpose of collection of personal information will be clearly stated at or before the information is collected. Where practical, NWP will collect personal information directly from individuals.
- 6.8 Personal information will not be released to third parties and will only be used for the purpose for which it was collected, except with the consent of the individual or as required by law.
- 6.9 Personal information will be maintained for the length of time necessary for its use, under the conditions of section 6.7. Personal information that is no longer required will be disposed of in accordance with NWP's Records Disposition Policy.
- 6.10 NWP will safeguard personal information and take all reasonable steps to protect the information in its possession by following the requirements of the Records Management Policy, Records Classification and Handling Policy, IT Email Policy, IT Acceptable Use Policy, and IT Security Policy.
- 6.11 If personal information is inadvertently disclosed, NWP will notify the Office of the Information and Privacy Commissioner immediately and conduct an internal investigation. NWP will follow the IT Security Incident Management Policy to respond quickly to such issues.
- 6.12 Upon request, individuals can access their personal information. The individual can challenge the accuracy and completeness of information and have it amended as appropriate.
- 6.13 Access to Information Requests will be handled in accordance with FOIP and within the time window allowable by the legislation.
- 6.14 From time to time, the Executive Council will evaluate NWP's compliance with this policy and related procedural documents, as well as the FOIP legislation.

7. Roles and Responsibilities

STAKEHOLDER	RESPONSIBILITIES
Executive Council	<ul style="list-style-type: none"> • Approve and formally support this policy.
Vice-President, Corporate Services	<ul style="list-style-type: none"> • Review and formally support this policy.
Information and Privacy Coordinator	<ul style="list-style-type: none"> • Develop and maintain this policy. • Review and approve any exception requests relative to the requirements in this policy. • Take proactive steps to reinforce compliance with this policy by all stakeholders. • Overall development and implementation of the Privacy program • Supervision of the operation of the program including the review and establishment of personal information banks, security protocols, privacy notices and forms, etc. • Manage all access to information requests • Manage all privacy breach responses • Ensure training and publication of privacy expectations • Ensure consent is received at collection points • Manage disposition of personal information, as required.
Institution Management, Supervisors or Representatives	<ul style="list-style-type: none"> • Explain the terms of this policy to employees and students and assist users to understand the requirements of this policy. • Ensure that all users follow the requirements of this policy.
Contract Administrators and Managers	<ul style="list-style-type: none"> • Follow the guidelines provided in this policy when performing due diligence and assessment of the risks related to security for any new contract. • Ensure that responsibilities and obligations of each party to the contractual relationship are outlined in the contract executed between the Institution and the contractor/sub-contractor.
Human Resources	<ul style="list-style-type: none"> • Present each new employee or contractor with the existing NWP policies, upon the first day of commencing work with NWP. • Support all employees and students in the understanding of the requirements of this policy.
All users (Employees and contractors, Students, Visitors and or Volunteers)	<ul style="list-style-type: none"> • Always comply with the requirements of this policy as applicable to them. • Report all non-compliance instances with this policy (observed or suspected) to their Supervisor, Instructor or Institution Representative as soon as possible.

8. Exceptions to the Policy

- 8.1 Exceptions to the guiding principles in this policy must be documented and formally approved by the Vice-President, Corporate Services.
- 8.2 Policy exceptions must describe:
 - 8.2.1 The nature of the exception
 - 8.2.2 A reasonable explanation for why the policy exceptions are required
 - 8.2.3 Any risk created by the exceptions to this policy
 - 8.2.4 Evidence of approval by the Vice-President, Corporate Services

9. Inquiries

- 9.1 Inquiries regarding this policy can be directed to the Information and Privacy Coordinator.

10. Amendments (Revision History)

- 10.1 Amendments to this policy will be published from time to time and circulated to the Institution community.
- 10.2 Policy updated September 1, 2023