

ACCESS TO INFORMATION AND PROTECTION OF PRIVACY (ATIP)

Background

Under provincial ATIP legislation, the District is a public body that is authorized to collect, use, and disclose personal information. Subject to specific and limited exceptions, individuals have a right of access to the records in the custody or under the control of the District, including personal information about themselves. Individuals also have the right to request corrections to their personal information.

The District's ATIP Coordinator is responsible to respond to formal requests to access records, but each employee is responsible to ensure that he or she collects, uses, and discloses personal information only in accordance with ATIP legislation.

The Office of the Information and Privacy Commissioner conducts independent reviews of decisions made by, and resolves complaints made against, the District.

Definitions

For the purposes of this Administrative Procedure:

"ATIA" means the *Alberta Access to Information Act*;

"ATIP legislation" means ATIA and POPA;

"District" means the corporation under the *Education Act* that operates schools in the Calgary Roman Catholic Separate School Division; and

"POPA" means the *Protection of Privacy Act*.

Procedures

1. For the purposes of the ATIP Act:
 - 1.1 the District is the public body; and
 - 1.2 the Chief Superintendent is the head of the public body.
2. The District must employ an ATIP Coordinator and appoint another employee as the Acting ATIP Coordinator when the ATIP Coordinator is out of the office for any reason.

3. In accordance with subsection 87(1) of the ATIA, the Chief Superintendent:
 - 3.1 retains all duties, powers, and functions of the head of the public body under sections 32 and 66 of the ATIA (privileged information and duty to comply with orders); and
 - 3.2 delegates all remaining duties, powers, and functions of the head of the public body under the ATIA to the ATIP Coordinator.
4. In accordance with subsection 55(1) of the POPA, the Chief Superintendent:
 - 4.1 retains all duties, powers, and functions of the head of the public body under sections 10 and 44 of the POPA (protection of personal information and duty to comply with orders); and
 - 4.2 delegates all remaining duties, powers, and functions of the head of the public body under the POPA to the ATIP Coordinator.
5. The ATIP Coordinator must educate employees about how to collect, use, and disclose personal information in accordance with ATIP legislation.
6. Each employee must collect, use, and disclose personal information only in accordance with ATIP legislation.
7. If an employee is not certain whether he or she will collect, use, or disclose personal information in accordance with ATIP legislation, then the employee must request and follow direction from the ATIP Coordinator before the employee collects, uses, or discloses the personal information.
8. Only the ATIP Coordinator may respond to a formal request to access a record under ATIP legislation, and the ATIP Coordinator must do so in accordance with ATIP legislation.
9. If an employee other than the ATIP Coordinator receives a formal request to access a record under ATIP legislation, then the employee must forward the request to the ATIP Coordinator immediately.
10. The ATIP Coordinator may seek legal advice from a lawyer for the District.
11. The ATIP Coordinator must not waive or disclose any information or record protected by any privilege that belongs to the District, including solicitor-client privilege, unless the Chief Superintendent approves.
12. No employee may refuse to disclose information or a record in its original form to the ATIP Coordinator if the ATIP Coordinator directs the employee to do so on the basis that such direction is necessary for the ATIP Coordinator to perform the ATIP Coordinator's duties under ATIP legislation or this Administrative Procedure.
13. Each employee must report any actual or suspected breach of ATIP legislation, whether intentional or not, to the ATIP Coordinator immediately.

14. No employee may take any adverse employment action against an employee only because the employee, acting in good faith, reported an actual or suspected breach of ATIP legislation by another employee to the ATIP Coordinator.
15. If the ATIP Coordinator receives a report about an actual or suspected breach of ATIP legislation, then the ATIP Coordinator must determine whether the District will report anything to the Office of the Information and Privacy Commissioner, the Government of Alberta, or both based on ATIP legislation and what is reasonable in the circumstances.
16. The ATIP Coordinator must respond to all requests from the Office of the Information and Privacy Commissioner.
17. A principal may use Form 180-1 POPA, Copyright, and Media Consent to seek consent for the District to use and disclose personal information for non-educational purposes.
18. The following is the District's standard collection notice under section 5 of the POPA:

The Calgary Catholic School District collects the personal information on this form under section 4(c) of the *Alberta Protection of Privacy Act* because it relates directly to and is necessary for our operating programs and activities under the *Alberta Education Act*. We may input personal information into automated systems. If you have questions about our collection, use, or disclosure of personal information, then please visit cssd.ab.ca or contact our ATIP Coordinator at ATIP@cssd.ab.ca.

Approval Date: August 28, 2025

Reference: *Education Act*, SA 2012, c E-0.3
Access to Information Act, SA 2024, c A-1.4
Protection of Privacy Act, SA 2024, c P-28.5