

ADMINISTRATIVE PROCEDURE

General Administration Access to Information Act / Protection of Privacy Act GEN #02

Revised: November 2025

Background

Alberta school jurisdictions are governed by the Access to Information Act (ATIA) for access to information rights and by the Protection of Privacy Act (POPA) for privacy. These Acts aim to balance the public's right to know with the individual's right to privacy concerning information held by public bodies in Alberta.

This update replaces previous Freedom of Information and Protection of Privacy (FOIP) references with the 2024 ATIA and POPA Acts (collectively referred to as "the Acts"), incorporates privacy breach reporting, consent, and delegation provisions, and restores Christ The Redeemer (CTR) Catholic Schools' guiding principles and staff responsibilities to align with division values and Catholic professionalism.

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

The division's Access to Information (ATIA) and Privacy (POPA) Coordinator (the Coordinator) is responsible for responding to formal requests to access records, while CTR Catholic employees are responsible for ensuring personal information is collected, used, and disclosed only in accordance with the Acts.

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

Procedures

- The following procedures integrate the updated legislative requirements under ATIA and POPA and reintroduce CTR Catholic's guiding principles and staff responsibilities to support faith-based professionalism.
- 2. The Superintendent shall serve as the Head of the Public Body under section 87(1) of the ATIA and section 55(1) of the POPA. The Superintendent retains all duties, powers, and functions related to privileged information, compliance with orders, and ensuring CTR Catholic complies with the provisions of the Acts.
- 3. The Superintendent delegates all other duties, powers, and functions to the Director of Communications, who serves as the Coordinator. An alternate Coordinator shall be designated when the primary Coordinator is unavailable.

- 4. School principals are responsible for ensuring that all school staff and volunteers act in accordance with the provisions of the Acts.
- 5. All Board policies, guidelines, regulations, and information request procedures shall be consistent with the Acts.
- 6. All forms used to collect student or employee information shall be approved by the Superintendent, or designate, prior to use.
- 7. When fees are to be paid, the rates adopted by the Government of Alberta shall be used by CTR Catholic.
- 8. The Coordinator shall educate employees on proper collection, use, and disclosure of personal information and maintain records of compliance activities.
- 9. As a public body, CTR Catholic will manage information in a manner that supports a commitment to providing the public with open access while protecting individual privacy. The following principles apply:
 - 9.1. To allow the right of access to any person to records in CTR Catholic's custody or control, subject only to limited and specific exceptions stated in the ATIA.
 - 9.2. To allow individuals, subject to limited and specific exceptions, the right to have access to personal information about them that CTR Catholic holds.
 - 9.3. To allow individuals the right to request corrections to personal information about them held by CTR Catholic.
 - 9.4. To provide an independent review of decisions made by CTR Catholic under the Acts, through the Office of the Information and Privacy Commissioner of Alberta.
- 10. No personal information will be collected unless its collection is specifically authorized by provincial legislation or is necessary for an operating program or activity of CTR Catholic. CTR Catholic may use or disclose personal information only for the purpose for which it was collected, for a consistent use, or for a purpose authorized under sections 38–43 of the POPA.
- 11. Employees must treat all information about students, families, and staff as confidential. Employees have a duty to protect such information and shall not disclose it to unauthorized persons unless written consent or legal authority exists.
- 12. Employees uncertain about disclosure or confidentiality must seek direction from the Superintendent the Coordinator before acting.
- 13. Employees must immediately report any actual or suspected breach of privacy to the Coordinator. The Coordinator shall determine whether notification to the Office of the Information and Privacy Commissioner of Alberta, the Government of Alberta, or both is required.
- 14. Employees must cooperate fully with any record request made by the Coordinator to ensure compliance under the Acts. No record may be withheld or destroyed when requested under ATIA or POPA authority.

- 15. Each employee must use division-approved consent forms for collecting, using, or disclosing personal information for non-educational purposes. A standard collection notice under section 5 of the POPA shall be included on such forms.
- 16. CTR Catholic shall maintain a Privacy Management Program consistent with POPA requirements, including privacy impact assessments for new or changed programs involving personal information.
- 17. Failure to adhere to this Administrative Procedure may result in disciplinary action, up to and including termination of employment.