

**NANAIMO LADYSMITH PUBLIC SCHOOLS  
BUSINESS COMMITTEE  
PUBLIC MEETING  
ACTION SHEET**

DATE: March 8, 2023  
TO: Business Committee  
FROM: Mark Walsh, Secretary-Treasurer and Dale Burgos, Executive Director of Communications  
SUBJECT: Privacy Management Program

---

### **Recommendation**

***The Business Committee recommends that the Board of Education of School District No. 68 (Nanaimo-Ladysmith) receive the Draft Policy – Privacy and circulate as a notice of motion for 30 days, utilizing the consultation process as per Board Governance, Section 1, 2.7 – Policy Development.***

### **Background**

Section 36.2 of the Freedom of Information and Protection of Privacy Act (FIPPA) requires each public body 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.

The head of a public body must develop a privacy management program for the public body and must do so in accordance with the directions of the minister responsible for this Act. In December 2022, the Province of B.C. released this [document](#) which provides guidance for all public bodies to follow.

### **Discussion**

As of February 1, 2023, B.C.'s Freedom of Information and Protection of Privacy Act (FIPPA) requires all public bodies to develop a PMP in accordance with mandatory PMP directions issued by the Minister of Citizens' Services. The district's plan has been posted under the [Information and Privacy](#) webpage.

The components each public body is expected to include in their PMP are:

1. Designating a privacy contact person
2. Privacy Impact Assessments and Information Sharing Agreements
3. Privacy complaints and privacy breaches
4. Privacy awareness and education activities
5. Making privacy practices and policies available
6. Informing service providers of privacy obligations
7. Monitoring and updating

As such Nanaimo Ladysmith Public Schools has created the following DRAFT policy and administrative procedures as it relates to a PMP:

- [3.10 Privacy Policy](#)
- [AP 533 Personal Information Management Program](#)
- [AP 534 Privacy Impact Assessments](#)
- [AP 535 Critical Incident and Privacy Breach](#)

In addition to the draft policy and procedures above, the school district currently has the following established privacy related APs:

- [Administrative Procedure 208 – FIPPA Designation of Head](#)
- [Administrative Procedure 209 – FIPPA Fee Schedule](#)
- [Administrative Procedure 519 – Retention and Destruction of Records](#)
- [Administrative Procedure 334 – Student's Personal Records](#)
- [Administrative Procedure 335 – Student and Employee Personal Privacy on the Internet](#)
- [Administrative Procedure 418 – Employee Records](#)

