

Maritime Conservatory of Performing Arts - PRIVACY POLICY -

I. POLICY STATEMENT

It is the policy of the Maritime Conservatory of Performing Arts to uphold the privacy and confidentiality of our students, parents, staff, faculty, alumni, volunteers, patrons, and Board members. We will only collect personal information which is required for a stated purpose; use the personal information only for that stated purpose; hold the personal information securely in confidence; disclose personal information only with consent; and dispose of personal information in a secure, accountable manner.

Personal information collected, used, or disclosed by the Conservatory will be administered in keeping with information access and privacy legislation. Consent for the collection, use, or disclosure of personal information will be requested when needed. Personal information collected, used, or disclosed by the Conservatory will be administered in keeping with the Privacy Principles as appended to this Policy [Schedule A].

II. DEFINITIONS

For the purpose of this Policy, the following definitions shall apply:

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| <i>Board</i> | Maritime Conservatory of Performing Arts Board of Governors |
| <i>consent</i> | voluntary agreement with what is being done or proposed. Consent is either express or implied. [Schedule B] |
| <i>Conservatory</i> | Maritime Conservatory of Performing Arts |
| <i>personal information</i> | any information, in any format, which may identify a specific individual |
| <i>privacy breach</i> | the loss of, unauthorized access to, or unauthorized disclosure of personal information |
| <i>PIA</i> | a privacy impact assessment (PIA) is a risk management tool used to identify and mitigate privacy concerns pertaining to a process, program, or procedure |
| <i>Privacy Officer</i> | the privacy subject matter expert appointed by the Board to administer privacy for the Conservatory |
| <i>record</i> | includes any correspondence, memorandum, book, plan, map, drawing, diagram, pictorial or graphic work, photograph, film, microform, sound recording, videotape, machine-readable record, and any other documentary material, regardless of physical form or characteristics, and any copy of any of these things. |

III. POLICY OBJECTIVE

The objective of this Policy is to ensure that the Conservatory meets legislated and ethical privacy obligations in a reasonable, accountable, and transparent manner.

The Conservatory will protect the personal information in its custody and control by making reasonable security arrangements against such risks as unauthorized collection, use, access, disclosure, or disposal. The Conservatory will be accountable for maintaining personal information securely by following accountable records management processes.

IV. APPLICATION OF POLICY

This Policy applies to:

- all staff, faculty, volunteers, and members of the Board members
- all students, parents, alumni, and patrons of the Conservatory

V. POLICY DIRECTIVES

- a) Personal information will be administered in keeping with the Privacy Principles appended to this Policy. [Schedule A]
- b) Confidential information in the custody or control of staff, faculty, or Board members will be held in confidence and not disclosed physically, electronically, or verbally to any unauthorized person.
- c) The Board will appoint an individual as Privacy Officer, responsible for the Conservatory's compliance with the Privacy Principles [Schedule A], for administering this Policy, and for advising the Board and staff on any privacy issues or concerns pertaining to the Conservatory.
- d) An e-mail link for questions or complaints pertaining to privacy will be posted on the Conservatory website. The Privacy Officer will have secure access to this e-mail and will respond confidentially to all queries in a timely manner.
- e) Any procedures, protocols, practices, or policies developed pursuant to this Policy must be authorized and approved by the Board, and appended to this Policy. Any substantive changes to such procedures or policies must be reviewed and approved by the Board.
- f) Procedures will be developed and implemented to manage the personal information collected, accessed, used, used, disclosed, and disposed of by the Conservatory.
- g) Personal information will only be collected, accessed, stored, used, disclosed, and disposed of in keeping with applicable access and privacy law.
- h) Only personal information which is required and necessary will be collected.
- i) Personal health information will only be collected and disclosed as necessary, to respond to health issues of the individual, or to respond to an emergency that threatens the life or limb.
- j) Any form, questionnaire, or survey (hardcopy or electronic) which requests personal information shall include a privacy statement and the contact information of the Privacy Officer
- k) Individuals, whom the information is about, will have timely access to their own personal information upon request.
- l) A Privacy Complaint Process will be developed and posted on the website.
- m) A Privacy Breach Protocol will be developed and followed by all staff, faculty, volunteers, and Board members.
- n) All real or perceived privacy breach allegations are to be responded to in keeping with the Privacy Breach Protocol. Any staff or faculty member discovering a privacy breach, or perceived privacy breach must report it immediately to the Privacy Officer.
- o) This Policy will be made readily available upon request. Reference to this Policy will be made on the Conservatory website.
- p) All staff and faculty will be made aware of this Policy and their accountabilities regarding personal information management.
- q) Collection and transmission of personal information via the Conservatory website will be encrypted and secure.
- r) This Policy will be reviewed by the Board every three years. The review will include any schedules, procedures, protocols, practices, or policies appended to the Policy.
- s) All staff, faculty, and members of the Board will receive privacy training relevant to their role with the Conservatory.

VI. POLICY GUIDELINES

- a) Personal information must only be used for the purpose for which it was collected.
- b) Staff collecting personal information should be able to explain to individuals the purpose(s) for which the information is being collected, and how it will be held securely.
- c) Access to records containing personal information must be limited to access needed for performance of duties. Only those staff/faculty who need-to-know should have access to any particular piece of personal information.
- d) Files/records containing personal information must not be left unattended in public or unsecure areas.
- e) Files containing personal information may only be taken offsite with permission from the Operations Manager, Dean, or Board Chair, and must be signed out/in.
- f) Personal information should not be stored on USB sticks or electronic hand-held devices.
- g) Electronic files and databases containing personal information must be password protected.
- h) Hardcopy files containing personal information must be maintained in a locked cabinet or locked office/room.
- i) Cell phones, laptops, and tablets used for Conservatory business which may contain personal information must be password protected.
- j) Staff, faculty, volunteers with access to personal information must not divulge their passwords to any other person.
- k) Notices regarding photography, video-taping, sound-recording, and physical touching will be placed in classrooms, and on the Conservatory website.
- l) A notice regarding photography, video-taping, and sound-recording will be included on performance programs.
- m) To protect the email addresses of individuals, any multiple or mass e-mailings must be sent to students, parents, alumni, volunteers, patrons using the 'bcc:' field (i.e. blind-copied).
- n) Third-party contracts with the Conservatory must contain a confidentiality clause, and a clause indicating compliance with this Privacy Policy.
- o) Third party contractors doing work, on behalf of the Board or Conservatory, which involves access to, collection, use, disclosure, or disposal of personal information will be provided with a copy of this Privacy Policy and Procedures, and with a copy of the Privacy Breach Protocol.
- p) Disposal of any document, including transitory records, containing personal information must be securely shredded.
- q) Any new or updated process or database, or the use of Social Media or an on-line App for Conservatory purposes, will be reviewed by the Privacy Officer, during the development stage, for privacy risk identification and mitigation, and to ensure that this Policy is complied with.
- r) Any new use of Social Media or an on-line App for Conservatory purposes will be reviewed by the Board.

VII. ACCOUNTABILITY

- The Board shall be accountable for compliance with this Policy.
- All staff and faculty are responsible for compliance with this Policy.
- All staff and faculty are responsible for upholding the privacy rights of students, parents, alumni, and patrons.

VIII. MONITORING:

- The Privacy Officer is responsible for monitoring compliance with this Policy.
- The Dean of Dance and the Dean of Music are responsible for random auditing of compliance with this Policy.
- The Board is responsible for review of this Policy and schedules every three years.

IX. REFERENCES:

Personal Information Protection and Electronic Documents Act [PIPEDA]
CASL [Canada's Anti-Spam Law]

X. ENQUIRIES REGARDING PRIVACY OR THIS POLICY:

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