

Revised: February 2026

Background

Rooted in our Catholic faith and the inherent dignity of every person, Christ The Redeemer (CTR) Catholic Schools is committed to protecting personal information with care, integrity, and respect. Adherence to Alberta's privacy legislation is both a legal responsibility and a moral obligation, ensuring that the trust placed in us by students, families, and staff is honoured through the careful, transparent, and ethical handling of personal information.

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 Act (FOIP) references with the 2024 ATIA and POPA Acts, incorporates privacy breach reporting, consent, and delegation provisions, and restores CTR Catholic's 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.

Right of Access: The public has the right of access to records held by public bodies, subject to narrow and specific exceptions.

An individual's right of access to their own information is significant and any exceptions to access should be interpreted with a view to giving an individual as much access as possible to their own personal information.

Any disclosure of personal information must be in compliance with the privacy provisions of the POPA and the ATIA.

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

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

Definitions

- The “Acts” means both the ATIA and POPA.
- “Employee” means a person who performs a service for the division, including a staff member, appointee, volunteer, student, or a person providing services under a contract or agency relationship with the division.
- Personal Information (PI) means personal information as defined by POPA being recorded information about an identifiable individual and may include name, contact information (home or business address, phone, email, etc.), gender identity, sexual orientation, and physical or mental health information.
- “Record” means information in any form that is written, photographed, recorded, or stored in any manner, but excludes software or any mechanism that produces records (i.e., the output is the record).
- “Head” means the Head of the Public Body, designated under the Acts, who holds ultimate authority and accountability for decisions under the Acts.

Procedures

1. The following procedures integrate the updated legislative requirements under ATIA and POPA and reintroduce CTR’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 Access to Information and Privacy Coordinator (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 division policies, guidelines, regulations, and information request procedures shall be consistent with the Acts.
6. All forms used to collect personal information shall be approved by the Superintendent, or designate, prior to use.

Fees and Proactive Disclosure

1. The division may set fees for services related to access requests, but these fees must not exceed the maximum fees provided for in the regulations made under ATIA. When fees are to be paid, the rates adopted by the Government of Alberta shall be used by CTR Catholic.
2. The division may specify categories of records that are available to the public without a formal request for access.
3. The Coordinator and school principals shall educate employees on proper collection, use, and disclosure of personal information and maintain records of compliance activities.
4. 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:
 - 4.1. 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.
 - 4.2. To allow individuals, subject to limited and specific exceptions, the right to have access to personal information about them that CTR Catholic holds.

- 4.3. To allow individuals the right to request corrections to personal information about them held by CTR Catholic.
- 4.4. To provide an independent review of decisions made by CTR Catholic under the Acts, through the Office of the Information and Privacy Commissioner.
5. 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.
6. 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.
7. Employees uncertain about disclosure or confidentiality must seek direction from the Superintendent or the Coordinator before acting.
8. Employees must immediately report any actual or suspected privacy incident (including loss, unauthorized access, or unauthorized disclosure) to the Coordinator. The Coordinator will complete a Real Risk of Significant Harm assessment and ensure any required notifications are made without unreasonable delay, in accordance with the Acts and prescribed requirements. Detailed steps, forms, and templates are maintained in the division’s Breach Response Protocol as defined in the division’s Privacy Management Program (PMP).
9. The Coordinator may seek legal advice as necessary but shall not waive solicitor-client privilege without written authorization from the Superintendent.
10. 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.
11. 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.
12. Where an applicant requests access to a record that does not exist in the requested form but can be produced from an electronic record using the division’s normal hardware, software, and technical expertise, and doing so would not unreasonably interfere with operations, the division will provide access to the produced record in accordance with the ATIA.
13. The division shall maintain a PMP consistent with POPA requirements, including documented policies and procedures, privacy impact assessments where required, and a security classification system with reasonable administrative, physical, and technical safeguards proportional to the sensitivity of the information.
14. Requests to correct personal information are handled under division procedures, including required timelines and the use of annotation/linkage where a correction is not made (e.g., where the information reflects an opinion or professional judgment).
15. Data derived from personal information, data matching, and automated processing/AI use are governed by the division’s PMP standards and procedures, including purpose limitation and retention/destruction requirements.
16. Failure to adhere to this Administrative Procedure may result in appropriate corrective action, including disciplinary action for employees, and may include termination of employment, termination of a contract, removal of access, or discontinuation of volunteer or student placements, as applicable.