

	<b>School Policy:</b>	<b>Employee Privacy</b>
	<b>Category:</b>	Privacy
	<b>Last Modified:</b>	
	<b>Approval Date:</b>	<b>December 5, 2022</b>
	<b>Review Date:</b>	December, 2025
	<b>Approved By:</b>	Head of School
	<b>Contact Person:</b>	Privacy Officer

Strathcona-Tweedsmuir School (STS), is committed to maintaining the accuracy, confidentiality, and security of personal information. This Policy describes the personal information that we collect from or about STS employees, how it is used, and to whom we disclose the information to.

This Policy applies to, governs the activities of, and covers only those activities that are subject to the [Personal Information Protection Act](#) (PIPA) of Employees at STS. All references in this Privacy Policy to “STS”, “School”, “we”, “us”, “our”, and like terms should be interpreted accordingly.

This Policy applies to the personal information of all individuals who are potentially, currently, or formerly employed by STS and includes any individual who performs a service for or in relation to or in connection with STS as a partner or a director, officer, or other office-holder of STS, as an apprentice, volunteer, participant, or student apprentice, or under a contract or an agency relationship with the organization; (collectively, an "Employee")

**What is Personal Information?**

For the purpose of this Policy, personal information means information about an identifiable individual.

**What Personal Information does STS Collect?**

STS collects and maintains different types of personal information in respect of our Employees, including the personal information contained in:

- resumes and/or applications;
- references and interview notes;
- photographs, audio, and videos;
- email and information technology use;
- offer letters and employment contracts;
- payroll information; including but not limited to social insurance number and pay cheque deposit information;
- wage and benefit information;
- forms relating to the application for or changes regarding employee health and welfare benefits including short and long-term disability, life insurance, optional life insurance, accidental death & dismemberment, medical and dental care; and
- beneficiary and emergency contact information.

In addition to the information contained in the examples listed above, we may also collect identification information such as name, home address, telephone, personal email address, date of birth, employee identification number, marital status, and any other information that is voluntarily disclosed by you.

Photos and videos may be used strictly for security purposes and will be limited in scope as to what they capture and will not include any areas of the facility where there is a reasonable expectation of privacy (such as bathrooms, change rooms, etc.).

Where permitted or required by applicable law or regulatory requirements, STS may collect information about its Employees.

As a general rule, STS collects personal information directly from its Employees. In most circumstances where the personal information that we collect about Employees is held by a third party, we will obtain the Employee's permission before we seek out this information from such source (such permission may be given directly by the Employee).

From time to time, STS may utilize the services of third parties. STS may also receive personal information collected by those third parties in the course of the performance of their services for STS or otherwise. Where this is the case, STS will take reasonable steps to ensure that such third parties have represented to STS that they have the right to disclose your personal information to STS.

### **Why Does STS Collect Personal Information?**

The personal information collected is used and disclosed for our business purposes, including being used for establishing, managing, or terminating employment or a volunteer relationship with STS. Such uses include:

- determining eligibility for initial employment/volunteering, including the verification of references and qualifications;
- monitoring of premises for safety and security purposes;
- monitoring of email and information technology systems;
- administering pay and benefits;
- processing employee work-related claims (e.g. workers' compensation, insurance claims, etc.);
- establishing training and/or development requirements;
- conducting performance reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- establishing a contact point in the event of an emergency (such as next of kin);
- complying with applicable labour or employment statutes; and
- compiling directories and telephone lists;

### **How Does STS Use and Disclose Your Personal Information?**

STS may use or disclose the Employee's personal information without the Employee's knowledge or consent where STS is permitted or required by applicable law or regulatory requirements to do so.

STS may use or disclose your personal information as required by law:

- for the purposes described in this Policy; or
- for any additional purposes that STS advises you of, and where your consent is required by law, STS has obtained the Employee's consent.

### **When Does STS Disclose Your Personal Information?**

STS may share the Employee's personal information with employees, contractors, consultants, and other parties who require such information to assist STS with managing our relationship with the Employee, including: third parties that provide services to STS or on STS's behalf (e.g. external payroll processing).

Further, the Employee's personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- to protect the rights and property of STS;

- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- where required by law, with your consent.

### **Notification and Consent**

Privacy legislation does not generally require STS to obtain the Employee's consent for the collection, use, or disclosure of personal information for the purpose of establishing, managing, or terminating employment or volunteer-work relationship, or managing a post-employment or post-volunteer-work relationship. In addition, STS may collect, use or disclose personal information without the Employee's knowledge or consent where STS is permitted or required by applicable law or regulatory requirements to do so.

To the extent that the Employee's consent is required, STS assumes that unless the Employee advises otherwise, the Employee has consented to the collection, use, and disclosure of their personal information as explained in this Policy.

Where the Employee's consent was/is required for collection, use, or disclosure of personal information, the Employee may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw their consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to the STS Privacy Officer.

### **How is Your Personal Information Protected?**

STS endeavors to maintain physical, technical, and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

### **Updating Your Personal Information**

It is important that the information contained in our records is both accurate and current. If any Employee's personal information happens to change during the course of your employment /volunteer relationship, please keep STS informed of such changes by emailing the HR Specialist.

In some circumstances, STS may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

### **Access to Your Personal Information**

Any Employee can ask to see their personal information. If the Employee wants to review, verify, or correct their personal information, please contact the STS Privacy Officer. Please note that any such communication must be in writing.

When requesting access to their personal information, please note that STS may request specific information from the Employee to enable STS to confirm your identity and right to access, as well as to search for and provide the Employee with their personal information. If any Employee require assistance in preparing a request, please contact the STS Privacy Officer.

The Employee's right to access the personal information that STS holds about them is not absolute. There are instances where applicable law or regulatory requirements allow or require STS to refuse to provide some or all of the personal information that STS holds about the Employee. In addition, the personal information may have been destroyed, erased, or made anonymous in accordance with STS record retention obligations and practices.

In the event that STS cannot provide the Employee with access to their personal information, STS will endeavor to inform the Employee of the reasons why, subject to any legal or regulatory restrictions.

### **Inquiries or Concerns?**

If any Employees have questions about this Policy or concerns about how STS manages their personal information, please contact the STS Privacy Officer by telephone, in writing, or by e-mail. STS will endeavor to answer questions and advise of any steps taken to address the issues raised. If any Employee is dissatisfied with a response, they may be entitled to make a written submission to the Privacy Commissioner Alberta.

### **Privacy Officer**

STS has appointed a Privacy Officer to oversee compliance with this Policy who can be reached as follows:

Privacy Officer (Jana Wager)  
Strathcona-Tweedsmuir School  
RR 2 Okotoks, AB T1S 1A2  
E-mail: [privacy@sts.ab.ca](mailto:privacy@sts.ab.ca)  
Phone: 403-938-8301

### **Revisions to this Policy**

STS may, from time to time, make changes to this Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with Employee's personal information.

### **Interpretation of this Privacy Policy**

Any interpretation associated with this Policy will be made by the STS Privacy Officer. This Policy includes examples but is not intended to be restricted in its application to such examples; therefore, where the word "including" is used, it shall mean "including without limitation".

This Policy does not create or confer upon any individual any rights, or impose upon STS any obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable.

Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.