

Privacy Policy

Policy Title: Privacy Policy	Applies to: All interactions that involve the collection, use or disclosure of personal information and personal health information	
Approved by: Senior Management Team	Effective: June 11, 2020 Last Review: June 2, 2020 Next Review: June 2021	Total # of Pages - 4
Authority: <i>The Freedom of Information and Protection of Privacy Act</i> <i>The Health Information Protection Act</i>		
Responsibility: Access and Privacy Officer		

- 1. Purpose of Policy**

The Saskatchewan Apprenticeship and Trade Certification Commission (SATCC) is committed to protecting personal, confidential and third party information. All personal information is collected by the SATCC in accordance with [*The Freedom of Information and Protection of Privacy Act \(FOIPPA\)*](#) and [*The Health Information Protection Act \(HIPA\)*](#).

The purpose of this policy is to establish appropriate controls and guidelines around the collection, use and disclose of personal information and personal health information as required to carry out the SATCC's mandate in accordance with *FOIPPA* and *HIPA*.
- 2. Scope**

This policy applies to all SATCC employees or contractors who access, collect, use, modify, retain, destroy or disclose personal information and personal health information in the possession, or under the control, of the SATCC.
- 3. Authority**

FOIPPA is the primary legislation governing the SATCC with respect to the protection of personal information and personal health information in the

SATCC's possession or under its control. Other legislation may authorize the collection, use or disclosure of information in the SATCC's possession or control.

4. Guidelines

4.1. Responsibility

The SATCC is responsible for all personal information and personal health information in its possession or under its control. The SATCC is authorized to, and may, enter third party agreements that involve the sharing of personal information.

Every employee or contractor who collects, uses, or discloses personal information and personal health information, as a result of their employment or contract with the SATCC is:

- Required to sign and abide by any relevant SATCC confidentiality agreements;
- Responsible for managing personal and confidential information in accordance with those agreements, this policy and related guidelines; and
- Responsible for proactively incorporating privacy protection into all projects and programs.

Every SATCC employee is responsible for safeguarding the privacy and security of information in the workplace and when working remotely.

4.2. Purpose

Any personal information and personal health information collected by or for the SATCC must be collected for an identified business purpose. This purpose must be identified at or before the time of collection.

4.3. Consent

Appropriate consent or authority from *FOIPPA* and *HIPA* is required to collect, use or disclose personal information and personal health information.

Consent must be obtained from an individual prior to collecting, using or disclosing their personal information and personal health information. Consent should be informed, meaning that the individual is aware of and understands the purpose for the collection and how the information will be used or disclosed.

In some cases gaining consent from the individual may not be feasible or appropriate. In these cases, authority for the collection must be derived from *FOIPPA* and *HIPA*, a bylaw, other legislation or policy.

- 4.4. Collection** When collecting personal information and personal health information, only collect the Information necessary to perform the identified task or function.
- 4.5. Use and Disclosure** Personal information and personal health information must only be used or disclosed for the purposes for which it was collected, or for a use that is consistent with that purpose; with the consent of the individual; or when collection, use or disclosure is authorized by legislation.
- 4.6. Retention** Personal information and personal health information should be retained only as long as necessary for the fulfillment of its stated collection purpose, or as specified by law. When the retention requirements have been met appropriate steps must be taken to safely and securely dispose of the records.
- 4.7. Accuracy** Reasonable efforts must be made to ensure that personal information and personal health information collected is as accurate, complete, and as up-to-date as required for the purposes it is to be used.
- 4.8. Security** The SATCC will ensure that appropriate security safeguards are in place to protect personal information and personal health information.
- These safeguards are intended to address such concerns as appropriate access to information, breach prevention, recovery, information integrity and other potential security issues. Safeguards include physical, technical, procedural and organizational measures.
- 4.9. Access** With some exceptions, individuals have the right to be informed of the existence, use and disclosure of information pertaining to them in the possession or under the control of the SATCC.
- Individuals also have the right to access their personal information and personal health information upon request, to challenge the accuracy and completeness of their personal information and to request their personal information and personal health information be amended when appropriate.
- 4.10. Privacy Breach** A privacy breach occurs when there is unauthorized access to, collection, use or disclosure of personal information and personal health information. Such activity is unauthorized if it occurs in contravention of *FOIPPA* and *HIPA*.

Privacy breaches may be intentional or unintentional. Any employee who knows of, or suspects, a privacy breach must report it immediately to their supervisor or the Access and Privacy Officer.

For further details please refer to the “SATCC Privacy Breach Policy and Procedures” <https://saskapprenticeship.ca/privacy-breach-policy-and-procedures-14-07-29/>

4.11. Ability to Challenge An individual has the right to file a complaint regarding the handling of their personal information and personal health information by contacting the SATCC Access and Privacy Officer.

If the individual remains dissatisfied with the SATCC’s response, the individual has the right to raise their concerns with the Office of the Saskatchewan Information and Privacy Commissioner.

5. Roles and Responsibilities

By delegation, the SATCC CEO is ultimately accountable for corporate information, including personal information and personal health information, at the SATCC.

The Access and Privacy Officer is responsible for providing guidance with respect to this policy and ensuring this policy is maintained.

The Access and Privacy Officer is responsible for receiving and investigating all access requests, privacy complaints or breaches in relation to the application of this policy as well as leading the privacy impact assessment process on programs and projects where personal and confidential Information is collected, used or disclosed.

All employees are responsible for familiarizing themselves with this policy and adhering to its principles and guidelines.

6. Reference Material

The Freedom of Information and Protection of Privacy Act
The Health Information Protection Act
SATCC Privacy Breach Policy and Procedures