
Managing Division Information, Access, and Privacy

Christ The Redeemer (CTR) Catholic Schools is committed to upholding the dignity of every person as created in the image and likeness of God. In our role as educators and leaders, we are entrusted with personal information that reflects the identities, experiences, and stories of students, staff, and families. This trust calls us to act as faithful stewards - ensuring that information is collected, used, accessed, and protected with integrity, care, and respect.

CTR recognizes that safeguarding personal information is both a legal obligation and a moral responsibility. Upholding privacy and access legislation reflects our commitment to justice, accountability, and right relationship within our school communities. Through responsible practices, we honour the trust placed in us and ensure that all individuals are treated with respect, transparency, and compassion.

CTR is committed to managing records, information, and data as essential public resources in a manner that supports accountability, transparency, good governance, and the protection of privacy. The division will fulfill its obligations under Alberta's *Access to Information Act* and *Protection of Privacy Act*, together with their regulations, while respecting the dignity of all persons and acting in a manner consistent with Catholic teachings.

A. Principles of Access and Accountability

The CTR Board of Trustees (Board) recognizes that a right of access to records held by a public body is a cornerstone of openness, transparency, and accountability.

1. **Public Right of Access:** Students, parents and staff and members of the public have a right of access to records in the custody or under the control of the division in accordance with the *Access to Information Act*, subject only to the limited and specific exceptions authorized by law.
2. **Openness and Routine Disclosure:** The division will support timely access to information through routine disclosure and existing administrative processes wherever appropriate and lawful. Formal access requests under the *Access to Information Act* are in addition to, and do not replace, existing procedures for access to information or records, including routine disclosure where appropriate and lawful.
3. **Records and Information Management:** The division shall maintain records and information management practices that support access, accountability, operational effectiveness, and legal compliance, including the ability to locate, retrieve, retain, and dispose of records in accordance with legislation, regulation, and approved records management practices.

B. Principles of Privacy Protection

The Board recognizes its responsibility to protect personal information and to ensure the lawful, appropriate, and careful collection, use, disclosure, retention, safeguarding, and disposal of personal information. The Board further recognizes that Alberta's privacy framework now also addresses data derived from personal information, non-personal data, and, in some circumstances, data matching (linking

or comparing personal information from two or more data sets) and the use of artificial intelligence or other automated systems.

Expectations:

The Board expects that the Superintendent shall establish, implement, and maintain administrative regulations, procedures, and governance structures necessary to ensure division compliance with the Access to Information Act, the Protection of Privacy Act, and related regulations, as set out below:

1. **Head of the Public Body:** The Board designates the Superintendent (or designate) as the Head of the Public Body under the access and privacy legislation, with authority to further delegate duties where permitted by law.
2. **Designated Authority:** The Superintendent (or designate) shall ensure the implementation of this policy through administrative regulations, including processes to meet the Division’s duty to assist under the Access to Information Act.
3. **Privacy Management Program**
The division shall establish, implement, maintain, and periodically review a Privacy Management Program in compliance with prescribed legislative and regulatory requirements.
4. **Employee Compliance:** All employees, contractors, volunteers, and others acting on behalf of the Division shall comply with provincial access and privacy legislation, adhering to training requirements and uphold the principles of the legislation.
5. **Governance Structure:** Accountability for access, privacy, records and information management, security, and compliance shall be clearly assigned within the organizational structure, including designation of an Access and Privacy Coordinator.

References:

- Access to Information Act* (Alberta)
- Protection of Privacy Act* (Alberta)
- Protection of Privacy (Ministerial) Regulation
- Protection of Privacy Regulation

Approved: May 27, 2026