

POLICY TITLE: Policy on Protection of Privacy and Access to Information	POLICY SECTION: Information Technology	POLICY NO: 3.1
RELATED BOARD POLICY:	1.4.3 Confidentiality and Access to Information	
RELEVANT LEGISLATION:	Freedom of Information and Protection of Privacy Act Personal Information protection and Electronic Documents Act	
RELATED DOCUMENTS:	King's Privacy Framework	
PRIMARY APPROVER:	Principal	
SECONDARY APPROVER:	Vice-President Finance and Support Services	
RESPONSIBLE DEPARTMENT:	Information Technology Services	
DATE APPROVED:	24 May 2024	
DATE(S) REVIEWED / REVISED:		
POLICY REVIEW - FREQUENCY:	To be reviewed annually	
APPROVER SIGNATURE:		

1. **Purpose:** The purpose of Policy 1.4.3 is to establish guidelines for access to information while ensuring the protection of privacy in alignment with the Privacy Framework established by King's University College (King's) and all legislative acts and regulations. This policy aims to uphold the principles of transparency, accountability, and respect for individual privacy rights.
2. **Scope:** This policy applies to all faculty, staff, students, contractors, and any other individuals associated with King's University who handle or have access to personal information in the course of their duties.
3. **Compliance:**

- 3.1 All activities related to access to information and protection of privacy shall be conducted in accordance with the Privacy Framework established by King's. This includes adherence to the principles of accountability, consent, limiting collection, accuracy, safeguards, openness, individual access, and challenging compliance.
- 3.2 The President will ensure a Privacy Officer or equivalent is appointed when required under legislation.
- 3.3 The President will ensure an Access to Information process is in place that meets the requirements of the Access to Information and other relevant Acts.
- 3.4 Any breach of confidentiality will be reported to the President within forty-eight (48) hours of the breach, and the President will determine the action or actions to be taken based on legislative requirements.
- 3.5 Considering any significant privacy breaches, the President will inform the Board Chair within forty-eight (48) hours.

4. Access to Information:

- 4.1 Individuals have the right to request access to their own personal information held by King's. Access requests shall be submitted in writing to the designated Privacy Officer or through the specified channels as outlined in the university's Privacy Framework.
- 4.2 King's shall respond to access requests in a timely manner and provide individuals with access to their personal information, subject to any applicable limitations or exceptions as permitted by law.
- 4.3 Access to personal information of individuals other than the requester shall only be provided where authorized by law or with the explicit consent of the individual.

5. Protection of Privacy:

- 5.1 Personal information collected, used, or disclosed by King's shall be protected through appropriate technical, administrative, and physical safeguards to prevent unauthorized access, use, disclosure, alteration, or destruction.
- 5.2 Employees and individuals handling personal information shall receive training on privacy best practices and their obligations under this policy and the Privacy Framework.
- 5.3 Personal information shall only be used or disclosed for the purposes for which it was collected, except with the consent of the individual or as required by law.
- 5.4 Any breaches of privacy or unauthorized access to personal information shall be reported promptly to the designated Privacy Officer for investigation and remediation.

6. Accountability and Monitoring:

- 6.1 The Privacy Officer shall oversee compliance with this policy and the Privacy Framework and shall be responsible for monitoring and reviewing privacy practices within King's.
- 6.2 The President will ensure King's conforms to and follows all legislative acts and regulations related to information, written, verbal and electronic, and privacy laws involving students, faculty, staff and organizational information management and disclosures.
- 6.3 Regular audits and assessments shall be conducted to evaluate the effectiveness of privacy measures and to identify areas for improvement.
- 6.4 Annual monitoring reports will be presented to the Board by the President, affirming compliance or summarizing breaches and the actions taken.
7. **Review and Amendment:** This policy shall be reviewed annually or as necessary to ensure its effectiveness and alignment with legal requirements and best practices. Amendments to this policy shall be approved by the President.
8. **Implementation:** This policy shall be communicated to all relevant stakeholders and made accessible through King's University's website or other appropriate channels. Training and awareness programs shall be provided to ensure understanding and compliance with this policy.
9. **Enforcement Violations:** of this policy may result in disciplinary action, up to and including termination of employment or academic sanctions, in accordance with King's University's disciplinary procedures.
10. **Effective Date:** This policy shall take effect immediately upon approval by the President.
11. **Contact Information:** For inquiries or assistance regarding this policy, individuals may contact the designated Privacy Officer at:

King's University College
Privacy Office
Acting Privacy Officer
Privacy@kings.uwo.ca