

**MEDICINE HAT PUBLIC BOARD OF EDUCATION OPERATES AS MEDICINE HAT PUBLIC SCHOOL DIVISION, AND FOR THE PURPOSE OF THIS DOCUMENT WILL BE REFERRED TO AS “MHPSD” AND/OR “DIVISION”**

SECTION 400 – Business Administration

**ADMINISTRATIVE PROCEDURE - EXHIBIT: DELEGATION OF AUTHORITY**

<i>EXHIBIT CODE:</i>	<i>412 E 001</i>
<b>Policy Reference: 412 – Managing Division Information, Access, and Privacy</b>	

EXHIBIT

The Protection of Privacy (Ministerial) Regulation, section 6(1)(a), requires the public body to designate or identify a privacy officer within the public body who will be responsible for ensuring the public body’s compliance with POPA.

Medicine Hat Public School Division designates the Secretary Treasurer as the Access and Privacy Officer.

<b>Function</b>	<b>Description</b>	<b>Delegated to</b>
<b>Manage Access Request Process</b>	Directing and managing the entire ATIA request lifecycle, including assigning requests, ensuring time limits are met, meeting notification requirements, calculating fee estimates, and collecting fees.	Access and Privacy Officer
<b>Finalize Routine Disclosure</b>	Advising staff on information that can be released as a routine disclosure or outside of a formal ATIA request.	Privacy Officer
<b>Program Development and Maintenance</b>	Developing, implementing, and maintaining the <b>Privacy Management Program (PMP)</b> , ensuring that procedures are incorporated into the organizational structure.	Privacy Officer
<b>PIA Coordination</b>	Coordinating the completion and submission of <b>Privacy Impact Assessments (PIAs)</b> for new or substantially changed programs or services.	Privacy Officer, IT
<b>Incident Response Management</b>	Setting up internal policies and procedures for handling privacy incidents, leading investigations into incidents, assessing the associated level of harm (RROSH), and	Superintendent, Privacy Officer, IT, Coordinating

	managing the mandatory notification process for the Commissioner, Minister, and affected individuals.	Committee
<b>Information Cataloguing</b>	Coordinating the development and maintenance of the <b>directory of records</b> and formally establishing the <b>Personal Information Banks (PIBs)</b> .	Data governance team, IT
<b>Record and Security Standards</b>	Developing a consistent <b>methodology (classification scheme)</b> for organizing records and developing a consistent set of categories for the classification of information based on sensitivities and disclosure risks.	Privacy Officer and Director of IT
<b>OIPC Liaison</b>	Coordinating all negotiations, mediations, inquiries, investigations, and audits with the <b>Office of the Information and Privacy Commissioner (OIPC)</b> .	Privacy Officer
<b>Expert Guidance and Training</b>	Providing general advice and assistance to employees on understanding and applying ATIA and POPA requirements, and coordinating mandatory training programs for all staff.	Privacy Officer, Human Resources
<b>Consent Rules</b>	Establishing internal rules respecting the purposes for which electronic and oral consent are considered acceptable.	Workshop in the new year
<b>Correction Management</b>	Overseeing the process for handling requests for correction of personal information, including the duty to annotate opinions and transfer requests to originating bodies.	Procedure

REFERENCES

- Protection Of Privacy Act (POPA)
- Protection Of Privacy Act Regulations

**Approved:** May 11, 2026