

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: COLLECTION AND CORRECTION OF
PERSONAL INFORMATION**

PROCEDURE CODE:	412 AP 002
Policy Reference: Policy 412: Managing Division Information, Access, And Privacy Policy	Exhibits: 412 E 004 – Correction of Personal Information

PROCEDURE

In accordance with the Protection of Privacy Act (POPA) the Division collect personal information lawfully, responsibly, and transparently. Personal information provided is collected in accordance with section 4(c) of the Protection of Privacy Act (POPA) and protected in accordance with section 10 and used and disclosed in accordance with sections 12 and 13 of the Act.

1. The Division collects personal information under the authority of:
 - 1.1. The Protection of Privacy Act (Alberta);
 - 1.2. The Education Act (Alberta);
 - 1.3. Any other applicable provincial or federal legislation.
2. The Division may collect personal information only where one or more of the following conditions apply:
 - 2.1. The collection is expressly authorized by law;
 - 2.2. The information is collected directly from the individual, or their guardian, agent, representative, or attorneys that can legally exercise rights for an individual under Section 54 ;
 - 2.3. The information relates directly to and is necessary for an operating program or activity of the Division; or
 - 2.4. The collection is required for law enforcement purposes.
3. Personal information is collected to enable MHPSD to:
 - 3.1. Register and enroll students;
 - 3.2. Maintain accurate academic, attendance, and program records;

- 3.3. Communicate effectively with students, parents, guardians, and staff;
 - 3.4. Provide educational programs, student services, and supports;
 - 3.5. Ensure safety, health, and well-being;
 - 3.6. Plan transportation, staffing, and resources; and
 - 3.7. Meet reporting, funding, and accountability requirements.
4. When personal information is collected, the Division shall ensure that individuals are informed of:
 - 4.1. The purpose for which the information is being collected;
 - 4.2. The legal authority for the collection;
 - 4.3. The contact information of the Divisions employee who can answer questions about the collection; and
 - 4.4. The information collected in an automated system is used to generate content or make decisions, recommendations or predictions.
 5. The Division shall implement limitations and safeguards:
 - 5.1. Collecting only the minimum amount of personal information necessary to fulfill its purposes;
 - 5.2. Protect personal information against unauthorized access, use, disclosure, or destruction;
 - 5.3. If personal information is used to make a decision that directly affects an individual (including those made via automated systems), the Division must retain that information for at least one year;
 - 5.4. Ensure that access to personal information is limited to individuals who require it to perform their duties;
 - 5.5. Provide notice of automated system use for personal information;
 - 5.6. Only enter the absolute minimum amount of personal information necessary into an AI prompt or system;
 - 5.7. Implement human oversight to review AI outputs; and
 - 5.8. Vet third-party vendors.
 6. Individuals have the right to:
 - 6.1. Provide consent for the use of personal Information under Section 12(1)(b) and Section 13(1)(c) for the disclosure of personal information.
 - 6.1.1. Consent may be given in a written format or electronic format.
 - 6.2. Request access to their personal information held by the Division;
 - 6.3. Request correction of inaccurate or incomplete personal information;
 - 6.4. Request access to information applicable in the Access to Information Act; and
 - 6.5. File a complaint regarding the handling of personal information in accordance with POPA.



- 6.6. Correct their personal information:
- 6.6.1. An individual may request correction of factual personal information held by MHPSD that contains an error or omission. The request must include supporting documentation (e.g., birth certificate, government ID, CRA documents).
 - 6.6.2. If facts are disputed and cannot be resolved through reasonable inquiry, MHPSD is not required to change the record but must annotate or link the correction request.
 - 6.6.3. MHPSD must respond in writing within 30 business days, confirming whether the correction was made, an annotation was added, or the request was refused.
 - 6.6.3.1. The Privacy Officer is responsible for tracking disclosures over the previous 12 months and notifying those recipients of any factual corrections or annotations.
 - 6.6.4. A request may be refused if the information is not personal, lacks adequate proof, is an opinion, or involves unresolved disputed facts.
 - 6.6.5. Correction requests may be transferred to the originating public body within 15 business days, and the individual must be notified.
 - 6.6.6. If a correction request involves information subject to the Health Information Act (HIA), that part of the request is deemed to be a request under the HIA and must be handled according to that Act's rules.
 - 6.6.7. Under Section 7(6), if the Division is notified by another public body about a correction or annotation to shared information, the Division must make that same correction on its own records.
7. All employees, trustees, and service providers acting on behalf of the Division shall comply with this policy. Failure to comply may result in corrective action in accordance with Division procedures and applicable legislation.

REFERENCES

Protection of Privacy Act

Approved: May 11, 2026

