

Title	Privacy Management Policy		
Number	26/01	Date	Aug 10, 2026
Revised			
Preamble			
The Fort Saskatchewan Public Library (FSPL) is committed to protecting personal privacy, maintaining public trust, and ensuring compliance with the Alberta <i>Protection of Privacy Act</i> (POPA) and the <i>Access to Information Act</i> (ATIA). All collection, use, disclosure, retention, and safeguarding of personal information by the library will be carried out in accordance with these Acts and the library's operational Privacy Management Program (PMP).			
Policy			
1. PURPOSE The purpose of this policy is to formally establish the library's commitment to privacy, fulfill the Board's legislative requirement to designate the "Head" of the public body, and officially authorize the creation and maintenance of the library's Privacy Management Program (PMP). 2. SCOPE This policy applies to all personal information, data derived from personal information, and non-personal data in the custody or under the control of the library. It applies to all individuals who perform work or services for the library, including employees, board trustees, volunteers, practicum students, and third-party contractors. 3. PROVISIONS Privacy Management Program: In accordance with Section 25 of POPA, the library shall establish and implement an operational Privacy Management Program. This program consists of documented administrative procedures to manage privacy risks, handle privacy complaints, respond to privacy incidents, conduct Privacy Impact Assessments (PIAs), and establish security safeguards. Designation of the Head: For the purposes of POPA and ATIA, the Library Board officially designates the Library Director as the "Head" of the public body. The Head is ultimately accountable for the library's compliance with the legislation.			

- **Designation of Privacy Officer & Delegation:** In accordance with Section 6(1)(a) of the Ministerial Regulation and Section 55 of POPA, the Head may delegate operational powers and duties in writing. The Library Director shall also serve as the library's designated Privacy Officer, responsible for the day-to-day administration and operational oversight of the Privacy Management Program.

4. RESPONSIBILITIES

The Library Board will:

- Review and approve this overarching policy every three years.
- Maintain governance oversight of the library's compliance with POPA and ATIA.
- Comply with statutory privacy provisions and complete mandatory privacy training appropriate to trustees' governance responsibilities.

The Library Director (acting as Head & Privacy Officer) will:

- Ensure the library complies with all provisions of POPA and ATIA.
- Maintain a written Delegation Table outlining assigned operational privacy duties and authorities under Section 55.
- Develop, approve, implement, and maintain the operational administrative procedures and safeguards that make up the Privacy Management Program (PMP).
- Act as the primary contact for access requests, correction requests, and privacy complaints.
- Ensure mandatory privacy training is delivered to all staff, volunteers, and contractors, and track training completion records.
- Oversee incident reporting, breach containment, risk assessments, and the completion of Privacy Impact Assessments (PIAs).

Employees, Volunteers, and Contractors will:

- Complete mandatory privacy training upon onboarding and participate in scheduled annual retraining.
- Comply with this policy, collection notices, and all related PMP procedures in their daily work.
- Protect personal information against risks such as unauthorized access, collection, use, disclosure, or destruction.
- Promptly report any suspected privacy breaches or incidents to the Privacy Officer.

Approval

Signature



Nicole Starker Campbell
Board Chair