

# Administrative Procedure 403

## Human Resources

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### PERSONNEL RECORDS

#### BACKGROUND

The collection, use, disclosure, retention, and protection of employee personal information shall be limited to that which is directly related to and necessary for the operation of Westmount Charter School's programs and services.

Personnel records support effective human resource management, decision-making, and legal compliance. All employee personal information shall be managed with integrity, confidentiality, and respect for privacy in accordance with the *Protection of Privacy Act* (POPA), the *Education Act*, and other applicable legislation.

The Superintendent is responsible for the implementation of this Administrative Procedure.

#### PROCEDURES

1. Purpose and Use of Personnel Records
  - 1.1 Personnel records shall be maintained to document an employee's service, employment history, and professional responsibilities.
  - 1.2 Information collected shall be limited to that which is necessary, reasonable, and directly related to employment and operational requirements, in accordance with the principle of minimum necessary information.
2. Contents of Personnel Records
  - 2.1 An employee's personnel file may include:
    - 2.1.1 Pre-employment materials, including application documents, correspondence, and other forms required by legislation;
    - 2.1.2 Employment contracts and evaluation reports;
    - 2.1.3 Correspondence between the employee and administrators related to employment;
    - 2.1.4 Information respecting professional learning and achievement; and
    - 2.1.5 Documentation related to employee benefits, including signed acknowledgements where applicable.
3. Confidential Information
  - 3.1 Confidential letters of reference received in relation to the appointment of an employee shall be maintained in confidence and shall not be disclosed to the employee, except as required by law.
4. Access to Personnel Records
  - 4.1 Access to personnel records shall be:
    - 4.1.1 Restricted to authorized staff who require access to fulfill their professional responsibilities, in accordance with the need-to-know principle; and
    - 4.1.2 Provided to the employee upon request, in accordance with POPA.
  - 4.2 The Superintendent or designate shall supervise access to personnel files and approve any additions or amendments resulting from such review, in accordance with applicable legislation.
5. Disclosure of Personnel Information

- 5.1 Information contained in a personnel file shall not be disclosed outside Westmount Charter School unless:
  - 5.1.1 Authorized in writing by the employee;
  - 5.1.2 Required by law; or
  - 5.1.3 Authorized under applicable legislation, including POPA.
- 5.2 Where personal information is disclosed, the employee shall be notified where required by legislation.
- 5.3 All disclosures shall be limited to the minimum amount of information necessary and appropriate to the intended purpose.
- 6. Storage, Retention, and Disposition
  - 6.1 Personnel records for active employees shall be securely stored at Central Office.
  - 6.2 Personnel records shall be retained and disposed of in accordance with AP-180 Records Retention and Disposition.
  - 6.3 Destruction of personnel records shall be conducted using secure methods and documented in accordance with the approved retention schedule.
- 7. Staff Responsibilities
  - 7.1 All staff are responsible for protecting personal information, maintaining confidentiality, and complying with POPA and related Administrative Procedures.
  - 7.2 Any actual or suspected privacy break involving personnel information shall be reported in accordance with AP 180 – Records Retention and Disposition.

**Legal Reference:** *Education Act*  
*Protection of Privacy Act (POPA)*

**Cross Reference:** AP-170 Access to Information and Protection of Privacy  
 AP-180 Records Retention and Disposition

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