



CASCADE

CHRISTIAN SCHOOL

Cascade Christian School Society Board Policy Manual

Policy No. 7620

Subject: Personal Information Privacy Policy for Parents and Students

Date Revised: October 22, 2011

The School's Commitment

Safeguarding confidentiality and protecting personal information is a fundamental concern of Cascade Christian School. The school is committed to meeting or exceeding the privacy standards established by the BC *Personal Information Protection Act (PIPA)*.

The school does not sell, lease, or trade information about parents and students to other parties.

The Personal Information Privacy Policy describes the policies and practices of Cascade Christian School regarding the collection, use and disclosure of personal information about parents and students including the steps the school has taken to ensure personal and financial information is handled appropriately and securely.

Definition

In this Personal Information Privacy Policy, the following terms have the meanings set out below:

"personal information" means any information about an identifiable individual, as further defined under British Columbia's Personal Information Protection Act or other applicable laws. Personal information excludes the name, position name or title, business telephone number, business address, business e-mail, and business fax number of an individual, as well as any publicly available information as designated under applicable laws, such as information available from a public telephone directly or from a public registry.

"Parent" means the parent, guardian, or other legal representative of a student.

"Student" means a prospective, current or past student of Cascade Christian School

"Client" refers to either defined parent or student

Ten Privacy Principles

As part of Cascade Christian School's commitment, the following *Ten Privacy Principles* govern the actions of the school as they relate to the use of personal information. These principles have been built upon the values set by the Canadian Standards Association's ***Model Code for the Protection of Personal Information*** and British Columbia's ***Personal Information Protection Act (PIPA)***.

Principle 1 – Accountability

Cascade Christian School is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school designates an individual(s) who is(are) accountable for the school's compliance with the *Ten Privacy Principles*. This individual is the *Privacy Officer* of the school and may be contacted through any school office -

Principle 2 – Identifying Purposes

Cascade Christian School will identify the purposes for which personal information is collected before or at the time the information is collected.

Principle 3 – Consent

Cascade Christian School will obtain consent of the individual for the collection, use or disclosure of personal information except where the law provides an exemption, grants permission, or creates a requirement for collection, use, or disclosure of personal information. The organization may collect information without consent for the purpose of providing students with the best possible education services as described by the school's Mission Statement, or during the course of the operations of building security systems and practices.

Principle 4 – Limiting Collection

Cascade Christian School will limit the personal information collected to those details necessary for the purposes identified by the school.

Principle 5 – Use, Disclosure and Retention

Cascade Christian School will only use, disclose and retain personal information for the purpose for which it was collected unless the individual has otherwise consented, or when its use, disclosure or retention is required or permitted by law. Personal information will only be retained for the period of time required to fulfill the purpose for which it was collected.

Principle 6 – Accuracy

Cascade Christian School will maintain personal information in as accurate, complete and current form as is necessary to fulfill the purposes for which it is to be used. Parents and students are responsible for providing current personal information to the school.

Principle 7 – Safeguarding Personal Information

Cascade Christian School will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

Principle 8 – Openness

Cascade Christian School will make information available to individuals concerning the policies and practices that apply to the management of their information.

Principle 9 – Individual Access

Cascade Christian School will inform an individual, upon the individual's request, of the existence, use and disclosure of the individual's information, and shall give the individual access to it in accordance with the law. Individuals may verify the accuracy and completeness of their information and may request that it be amended, if appropriate.

Principle 10 – Complaint Process

Individuals may direct any enquiries with respect to the school's personal information policies or practices to the Privacy Officer of Cascade Christian School. Questions, concerns, and complaints about privacy, confidentiality and information handling by the school may be addressed to the school's Privacy Officer, the Principal, by calling the school office. If necessary, clients will be referred to use the school's complaint procedure and appeals policies.

What Information is Collected?

Cascade Christian School gathers and uses personal information to provide the students with the best possible educational services described by the Mission statement of the school. Personal information is gathered directly from parents and students, with consent, during registration.

When registration applications are received, the school will ask the prospective client to provide the information that enables it to complete the registration process. This process may also include information on academic, health, and personal matters needed by the school to provide the best possible education and co-curricular programs.

How is Information Used?

Cascade Christian School uses:

- personal information to communicate with clients, process applications and ultimately to provide parents and students with the educational services and co-curricular programs expected;
- personal information to enable the school to operate its administrative function, including payment of school fees and maintenance of non-educational school programs including parent and student participation and fundraising;
- anonymous personal information to constantly improve the school (e.g. surveys)
- health, psychological, or legal information to provide certain specialized services in those areas or as adjunct information in delivering educational services.

If for any reason personal information is required to fulfill a different purpose, the school will notify the client (where appropriate) and ask for consent before the school proceeds.

When may Information be Disclosed?

Cascade Christian School keeps personal information strictly confidential and treats it with care and respect. However, some of an individual's personal information may be shared with others as noted below.

a) Authorized by the Parent or Student

- Other educational institutions routinely contact the school for personal information about students. For example, if a student moves to another school, college or university, student records are requested by the enrolling institution. Permission to pass on these records is usually obtained when the student is registered and parents authorize the school to disclose such information to other appropriate educational institutions for the ongoing education of the student.
- Contact information may be used to enable the school to provide the para-educational and administrative services usually operated by the school. These services include phoning committees, participation groups, parent meetings, fundraising, events, annual general meetings, etc. By registering to the school, the parents and students understand that their personal information such as phone number, address, etc. may be disclosed to others.

In some cases, when communication is over the telephone, parent or student consent to the use and/or disclosure of their information will be obtained verbally. In other cases, such as electronic communications (e-mail), consent will be obtained electronically.

b) Required by Law

The type of information the school is legally required to disclose most often relates to family court issues, legal proceedings, court orders and government tax reporting requirements. Student information as per Form 1701 is annually filed with the Ministry of Education.

Only the information specifically requested is disclosed and the school takes precautions to satisfy itself that the authorities making the request have legitimate grounds to do so.

c) Permitted by Law

The school is legally permitted to disclose some personal information in situations such as an investigation of illegal activities, reasonable methods to collect overdue accounts, a medical emergency or suspicion of illegal activities etc. Only pertinent information is disclosed.

d) The School's Employees

In the course of daily operations, access to personal information is restricted to authorized employees who have a legitimate reason for accessing it. For example, teachers will have access to personal information about students but not information about their financial account with the school.

All employees of Cascade Christian School are required to abide by the privacy standards governed under PIPA. They will be required to work within the principles of ethical behavior as set out in employment contracts and must follow all applicable laws and regulations. Employees will be well informed about the importance of privacy and they will be required to sign a confidentiality agreement that prohibits the disclosure of any personal information to unauthorized individuals or parties. To reinforce their understanding and

commitment to upholding client privacy and confidentiality, employees will periodically receive current literature about the school's privacy policy, principles and standards.

An employee's failure to abide by school policies may result in discipline, up to and including termination of employment. A volunteer's failure to do so may result in termination of the volunteer relationship.

e) **Outside Service Suppliers**

At Cascade Christian School, the school may contact outside organizations to perform specialized services such as printing, student assessments, market research or data processing. For example, the school gives its yearbook publisher the information required to produce the annual yearbook. Suppliers of specialized services are given only the information necessary to perform those services.

f) **Restricting the Disclosure of Personal Information**

If clients choose to limit the sharing of personal information, they must contact the Privacy Officer, and submit a written letter specifying which items of personal information they wish to limit, and to whom they wish these items to be restricted. Please remember that certain agencies, by law, have access to certain types of personal information. The Privacy Officer will advise the individual whether the requested information can be restricted in the manner requested.

How Does the School Safeguard Information?

Cascade Christian School maintains appropriate security standards to ensure that the clients' personal and financial information is protected against unauthorized access, disclosure, inappropriate alteration or misuse.

Student Files

Student files are stored in secured filing cabinets. Access is restricted to only those employees (teachers, teacher-aides, counselors, secretaries, etc.) who, by the nature of their work, are required to see them.

Electronic Security

The school manages electronic files appropriately with passwords and security measures that limit access by unauthorized personnel. The school's security practices are reviewed periodically to ensure that the privacy of information is not compromised.

Record Management

Personal information is destroyed one year after the school no longer needs the information or one year after legal minimum retention requirements have been met.

Accessing and Amending Information

Cascade Christian School makes decisions based on the information it has. The school makes every effort to ensure information is accurate and complete.

Accessing Information

Clients may access and verify any of their personal information, with appropriate notice so that the office is able to supply them with the information they require. Most of this information is available in the registration forms and other forms that clients provide.

Accessing Student Information

Parents may access and verify school records of their children, with appropriate notice during normal school hours. In situations of family breakdown, the school will grant access to records of students upon being provided with applicable Court Orders or Separation Agreements.

Amending Information

To assist the school in keeping personal information accurate and complete, Cascade Christian School encourages its clients to request the school to amend inaccuracies and make corrections. Where appropriate, the school will communicate these changes to other parties who may have unintentionally received incorrect information from the school.

Amendments to CASCADE Personal Information Privacy Policy

The school may add, modify or remove portions of this policy when appropriate, in accordance with Cascade Christian School by-laws and as permitted or required by law. Clients may ask for the most recent update of this policy at the school office.

What Specific Action Has Cascade Christian School Taken to Protect Parent and Student Personal Information?

Cascade Christian School will provide teachers with the tools to protect personal information on campus, and will require any work-related personal information taken off campus to be used, stored and disclosed in a manner consistent with this policy.

Storage

- Student registration information must be stored in a secure location with access restricted to authorized individuals employed by Cascade Christian School.
- Information Technology staff are required to sign an agreement with Cascade Christian School acknowledging that they will not release any personal or confidential information to any unauthorized individual within or outside of Cascade Christian School. Breaches of this agreement may result in dismissal.
- Technology staff will ensure that all teachers have access to computers that are password protected.

Student Personal Information Taken Off-Campus

- No student personal information shall be removed from the school except for work related purposes.
- Teachers will ensure that personal staff, parent and student information that is removed from the school for work related purposes, is not released to unauthorized third parties while in the teacher's possession off campus, and will ensure that it is stored in a secure manner.