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Date of Policy

**PERSONAL INFORMATION PRIVACY POLICY  
FOR PARENTS AND STUDENTS**  
of

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*Name of School*

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*Address*

*Independent schools in British Columbia are invited to adopt or adapt some or all this sample policy. This policy document is not legal advice but is intended to assist members in complying with the requirements of the Personal Information Protection Act (British Columbia).  
Only the Act is definitive.  
Lawyers should be consulted for legal advice.*

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\_\_\_\_\_  
*Date of Policy*

\_\_\_\_\_  
*Name of School*

## PERSONAL INFORMATION PRIVACY POLICY FOR PARENTS AND STUDENTS

### The School's Commitment to You

Safeguarding personal information of parents and students is a fundamental concern of *(Name of school)* \_\_\_\_\_. The school is committed to meeting or exceeding the privacy standards established by British Columbia's *Personal Information Protection Act* (PIPA) and any other applicable legislation.

This Personal Information Privacy Policy describes the policies and practices of *(Name of school)*: \_\_\_\_\_ regarding the collection, use and disclosure of personal information about students and parents, including the steps the school has taken to ensure personal and financial information is handled appropriately and securely.

*(Name of school)*: \_\_\_\_\_ may add, modify or remove portions of this Personal Information Privacy Policy when it is considered appropriate to do so, and any such changes will be effective upon giving notice of the revised policy. You may ask for the most recent update of this Personal Information Privacy Policy at the school office. This Personal Information Privacy Policy may be supplemented or modified by agreements entered into between *(Name of school)* \_\_\_\_\_ and an individual from time to time.

### Ten Privacy Principles

As part of *(Name of school)* \_\_\_\_\_'s commitment, the *Ten Privacy Principles* govern the actions of the school as they relate to the use of personal information. This Personal Information Privacy Policy describes the *Ten Privacy Principles* and provides further details regarding *(Name of school)*: \_\_\_\_\_'s compliance with the principles.

### Definitions

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 email, 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 directory 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 *(Name of school)* \_\_\_\_\_

## **Principle 1 – Accountability**

(Name of 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.

You may contact our Privacy Officer as follows:

(Name of school):	
Attention:	Privacy Officer
Address:	
Phone:	
Fax:	
Email:	privacyofficer@

## **Principle 2 – Identifying Purposes**

(Name of school): \_\_\_\_\_ will, before or at the time personal information is collected, identify the purposes for which the information is collected, used and disclosed.

### **What Information is Collected?**

(Name of school) \_\_\_\_\_ collects and uses personal information to provide students with the best possible educational services enunciated by the Mission statement of the school. Most of the information the school collects come to the school directly from parents and students or is information regarding the student’s school activities, performance or behaviour, such as attendance records or grades. For example, when a student applies to register in the school, the school will ask you to provide the information that enables it to complete the registration process. This also includes information on academic, health, and personal matters needed by the school to provide the best possible education and co-curricular programs. (Name of school): \_\_\_\_\_ also collects information in connection with the use of its computer systems.

**[Personal information may also be collected and used and disclosed in the course of the operation of building security systems, including video and other surveillance systems.]**

## **Principle 3 – Consent**

(Name of school): \_\_\_\_\_ will obtain consent of the individual for the collection, use or disclosure of personal information except where the law states exemptions, grants permission, or creates a requirement for collection, use, or disclosure of personal information.

Requirements for consent to collection, use or disclosure of personal information vary depending on circumstances and on the type of personal information that is intended to be collected, used or disclosed. In determining whether consent is required and, if so, what form of consent is appropriate, (Name of school): \_\_\_\_\_ will take into account both the sensitivity of the personal information and the purposes for which (Name of school): \_\_\_\_\_ will use the information. Consent may be express, implied (including through use of “opt-out” consent where appropriate) or deemed. For example, if an individual provides his/her mailing address and requests information regarding a particular service, consent to use the address to provide the requested information may be implied.

On giving reasonable written notice to (Name of school): \_\_\_\_\_, an individual may withdraw consent to the collection, use or disclosure of his or her personal information. Upon notice of withdrawal of consent, (Name of school): \_\_\_\_\_ will notify the individual of the likely consequences of withdrawing his or her consent and, except where otherwise required or permitted by law, (Name of school): \_\_\_\_\_ will stop collecting, using or disclosing the personal information as requested.

If a person provides (Name of school): \_\_\_\_\_ or its service providers or agents with personal information about an individual, the person represents that it has all necessary authority and/or has obtained all necessary consents from such individual to enable (Name of school): \_\_\_\_\_ to collect, use and disclose such personal information for the purposes set forth in this Personal Information Privacy Policy.

### **Principle 4 – Limiting Collection**

(Name of school): \_\_\_\_\_ will limit the personal information collected to that information necessary for the purposes identified by the school.

### **Principle 5 – Use, Disclosure and Retention**

(Name of 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.

### **How is Information Used?**

(Name of school) \_\_\_\_\_ uses personal information as follows:

- to communicate with parents and students, process applications and ultimately to provide students with the educational services and co-curricular programs you expect.
- to enable the school to operate its administrative function, including payment of school fees and maintenance of non-educational school programs including parent and volunteer participation and fundraising.
- health, psychological, or legal information to provide certain specialized services in those areas or as adjunct information in delivering educational services.
- **[NOTE: list additional purposes for which student or parent personal information is used.]**

If for any reason personal information is required to fulfill another purpose, the school will, where appropriate, notify you and ask you for your consent before the school proceeds.

(Name of school) \_\_\_\_\_ may use anonymous information, such as information collected through surveys or statistical information regarding students, to constantly improve our school.

### **When May Information be Disclosed?**

(Name of school): \_\_\_\_\_ may disclose an individual's personal information to others in connection with the purpose for which it was collected, as consented to by the individual, or as required or permitted by law. The following are some examples of how (Name of school): \_\_\_\_\_ may disclose personal information.

### ***When Authorized by You***

- 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. Your permission to pass on these records is usually obtained when the student is registered, and you 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.

**[NOTE: Consider whether the foregoing uses are applicable to your school and consider whether additional purposes should be listed.]**

In some cases, when communication is over the telephone, your consent to the use and/or disclosure of your information will be obtained verbally. In other cases, such as when you communicate through e-mail, your consent will be obtained electronically.

### ***When 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.

### ***When 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.

The school does not sell, lease or trade information about you to other parties.

### ***Outside Service Suppliers***

At *(Name of school)*: \_\_\_\_\_, the school sometimes contacts 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, and *(Name of school)*: \_\_\_\_\_ takes appropriate steps to ensure that such information is securely transferred and stored and is used only to fulfill the purposes for which it was disclosed to the service provider.

### ***Restricting Sharing Information***

If you choose to limit the sharing of your personal information, please contact the school office and submit a written letter specifying which items of personal information you wish to limit, and to whom you wish these items to be restricted. Please remember that certain agencies, by law, have access to certain types of personal information.

## How Long Is Personal Information Retained?

Personal information will only be retained for the period of time required to fulfill the purpose for which it was collected. Once the personal information is no longer required to be retained to fulfill the purposes for which it was collected and is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous.

### **Principle 6 – Accuracy**

(Name of school): \_\_\_\_\_ will take appropriate steps to ensure that personal information collected by (Name of school): \_\_\_\_\_ is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used or disclosed.

## How May I Update Outdated or Incorrect Information?

An individual may, upon written request to (Name of school): \_\_\_\_\_ request that (Name of school): \_\_\_\_\_ correct an error or omission in any personal information that is under (Name of school): \_\_\_\_\_'s control (Name of school): \_\_\_\_\_ will, as appropriate, amend the information as requested and send the corrected personal information to each third party to which it has disclosed the information during the preceding year.

### **Principle 7 – Safeguarding Personal Information**

(Name of school): \_\_\_\_\_ will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

## 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 your account with the school.

Employees are appropriately educated about the importance of privacy and they are required to follow the school's policies and procedures regarding handling of personal information.

## 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 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 personal information is not compromised.

### **Principle 8 – Openness**

(Name of school) \_\_\_\_\_ make information available to individuals concerning the policies and practices that apply to the management of personal information.

Individuals may direct any questions or enquiries with respect to the school's privacy policies or practices to the Privacy Officer of *(Name of school)* \_\_\_\_\_

### ***Principle 9 – Individual Access***

*(Name of school):* \_\_\_\_\_ will inform an individual, upon the individual's request, of the existence, use and disclosure of the individual's personal information, and shall give the individual access to it in accordance with the law.

### **How May I Access My Personal Information?**

Individuals may access and verify any personal information with appropriate notice so that the office is able to supply the information required. Most of this information is available in the registration forms and other forms that you filled out.

### **Parent Access to Student Personal Information**

A parent may access and verify school records of the student, with appropriate notice during normal school hours. In situations of family breakdown, the school will grant access to records of students in accordance with the law.

### **Student Access to Student Personal Information**

**[NOTE: After reviewing their obligations under PIPA, schools should consider adopting a policy (or revising their existing policy) regarding access by students to their own personal information.]**

### ***Principle 10 – Complaint Process***

Individuals may question compliance with the above principles.

### **Questions, Concerns and Complaints**

Questions, concerns, and complaints about privacy, confidentiality and personal information handling policies and practices of the school should be directed to the school's Privacy Officer by calling the school office. If necessary, individuals will be referred to use the school's complaint procedure and appeals policies.



## APPENDIX

### Suggestions for Language in Various Documents Used by Independent Schools for Parents and Students as they pertain to the PIPA legislation.

January 2004

#### Is There Sample Language for Use on Student Registration Forms?

Each school authority has its own procedure for registering students in its school. In addition to the specific data that you request for your school, FISA suggests that you include appropriate consent language in the applicable forms and documents. The following is sample consent language:

1. I consent to having *(Name of school):* \_\_\_\_\_ collect personal information that may include student identification information, birth certificate, legal guardianship, court orders if applicable, parents' work numbers and e mail address, behavioural, academic and health information, most recent report card, emergency contact name and number, doctor's name and number, health insurance number and any similar information needed for registration.

I further consent to the use and disclosure of information contained in this form and otherwise collected by or on behalf of *(Name of school):* \_\_\_\_\_ (1) for the purpose of establishing, maintaining, and terminating the student's or parent's relationship *(Name of school):* \_\_\_\_\_ (2) for additional purposes identified when or before personal information is collected, and (3) as otherwise provided in *(Name of school):* \_\_\_\_\_'s Personal Information Privacy Policy, a copy of which is available on request. I also consent to the collection, use and disclosure of such personal information by and to agents, contractors and service providers of *(Name of school)* \_\_\_\_\_.

*This information is required in order to register your child at this school and assist the school authority in making an informed decision as to your child's suitability and appropriate placement in the school. It will also allow the school to respond immediately to an emergency. For more information, the privacy officer for (Name of school): \_\_\_\_\_ is \_\_\_\_\_ and may be reached at \_\_\_\_\_.*

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

2. I consent to having photographs and work samples of my child(ren) used by *(Name of school):* \_\_\_\_\_ in the yearbook, newsletters and other promotional material.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Additional Optional Language:

3. The school may prepare a family phone list (car pool list, class list, etc.) for a family phone directory. If you DO NOT want your phone number and address included, please indicate:  No

Signature: \_\_\_\_\_

## Is There Sample Language for Use on Parent Information Forms?

### Parent Personal Information

FISA would recommend that schools seek a disclaimer from parents on specific documents required by the school where parental involvement is required. For example, driving and insurance records, criminal records checks, correspondence, etc. A sample disclaimer might read as follows:

1. I acknowledge that my vehicle insurance information and driving record are required by the school to protect against third party liability claims in case of an accident, should I use my vehicle to drive for the school. I understand that this information will only be released in the event of an accident.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

### 2. Release and Storage of Parent Personal Information

(Name of school): \_\_\_\_\_ acknowledges that there will be no disclosure of personal information to unauthorized personnel or third parties who are not directly involved in school management or the care, supervision and instruction of your child(ren) at this school, unless written authorization from a parent or legal guardian is provided to the school. The school will securely store all digital and hard copy parent and student personal information.

Name of School Privacy Officer: \_\_\_\_\_ Title: Privacy Officer

Signature of School Privacy Officer: \_\_\_\_\_ Phone: \_\_\_\_\_

## Is there Sample Language for Use on Other Forms?

The sample language above is instructive for creating your own language for consent. The language should contain consent to collection of the information and state how the information will be used. Student field trip permission, fundraising from parents and the wider community, alumni contact, and activities are examples of school-related activities for which the school will need specific personal information.