



[Insert Date of Policy]

PERSONAL INFORMATION PRIVACY POLICY
FOR EMPLOYEES AND VOLUNTEERS

of

[ABC SCHOOL]

Address

Independent schools in British Columbia are invited to adopt or adapt some or all of 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.

Issued by FISA March 2004

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[Insert Date of Policy]

[Insert Name of School]

PERSONAL INFORMATION PRIVACY POLICY FOR EMPLOYEES AND VOLUNTEERS

The School's Commitment to You

Safeguarding personal information of employees and volunteers is a fundamental concern of **[ABC 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 **[ABC School]** regarding the collection, use and disclosure of personal information about employees and volunteers, including the steps the school has taken to ensure personal and financial information is handled appropriately and securely.

[ABC 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. The most recent update of this Personal Information Privacy Policy can be found in the [Staff Manual/Policies and Procedures Manual] of **[ABC School]** or is available from administration. This Personal Information Privacy Policy may be supplemented or modified from time to time.

Ten Privacy Principles

As part of **[ABC 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 **[ABC School]**'s compliance with the principles.

Definition

In this Personal Information Privacy Policy, the following term has the meaning 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.

Principle 1 - Accountability

[ABC 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:

[ABC School]	
Attention:	Privacy Officer
Address:	
Phone:	
Fax:	
Email:	privacyofficer@

Principle 2 - Identifying Purposes

What Information is Collected, Used and Disclosed?

Employees

[ABC School] collects, uses and discloses personal information about employees in order to establish, manage and terminate the employment relationship and for other purposes identified when the information is collected.

Set out below are some examples of personal information about employees collected, used and disclosed by **[ABC School]**:

- personal information collected, used and disclosed in the hiring process, including information on resumes and application forms (contact information, personal and professional history, qualifications, emergency contact information) results of criminal records checks, information collected from references;
- payroll and related information including, social insurance number, rate of pay, hours of work, deductions, bank account information, any court orders;
- benefit information including social insurance number, premiums or contributions, coverage information, date of birth, marital status, dependent information, medical information;
- performance information, including work history, performance reviews, discipline and related notes and memorandums, documentation related to job qualifications (professional or technical qualifications), internal competition information;
- other personal information as required or permitted by law.

[NOTE: The above list should be reviewed to ensure purposes are applicable. All purposes for which personal information about employees is collected and used should be listed.]

Volunteers

[ABC School] collects, uses and discloses personal information about volunteers for the purposes of recruiting volunteers and establishing and managing an effective volunteer program and for other purposes identified when the information is collected.

Set out below are some examples of personal information about volunteers collected, used and disclosed by **[ABC School]**:

- information collected, used and disclosed in the recruiting process including information on resumes and application forms (contact information, personal and professional history, qualifications) and information collected from any references;
- information related to the volunteer's services, including availability, schedule, duties, reviews, and related notes and memorandums and documentation related to volunteer qualifications (professional or technical qualifications);

[NOTE: The above list should be reviewed to ensure purposes are applicable. All purposes for which personal information about volunteers is collected and used should be listed.]

[NOTE: Add one or more of the following, if applicable:

Personal information about employees and volunteers (including photographs and biographical information) may also be collected, used and disclosed in the course of the school's activities including in publications such as yearbooks and newsletters, and websites.

Computer use and e-mail are monitored in accordance with the [Computer, Internet and/or Email Policy as applicable] and personal information is collected in the operation and maintenance of these systems.

Personal information about employees and volunteers may 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

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, **[ABC School]** will take into account both the sensitivity of the personal information and the purposes for which **[ABC School]** will use the information. Consent may be express, implied (including through use of "opt-out" consent where appropriate), or deemed.

Most personal information is collected, used and disclosed for the purposes of establishing, managing and terminating the employment or volunteer relationship. In most cases, consent is not required. In other cases, consent will be sought or implied where it is reasonable to do so.

From time to time, **[ABC School]** may advise employees and volunteers of other purposes for which it will collect, use or disclose personal information, in which case the school will, if appropriate, obtain consent for collection, use or disclosure of that personal information.

Principle 4 - Limiting Collection

[ABC School] will limit the personal information collected to that information necessary for the purposes identified by the school.

Principle 5 - Use, Disclosure and Retention

[ABC 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?

Personal information about employees and volunteers is used for the purposes identified under Principle 2.

If for any reason personal information is required to fulfill another purpose, the school will notify the employee or volunteer of that purpose.

[ABC School] may use anonymous information, such as information collected through surveys or statistical information about employees and volunteers to improve the school's operations.

When May Information be Disclosed?

[ABC 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.

Personal information about employees is disclosed to third parties for purposes related to the employment relationship, including to:

- government departments, bodies and agencies such as Canada Customs and Revenue Agency, Workers Compensation Board, Ministry of Education;
- payroll outsourcers;
- financial institutions for payroll related purposes;
- insurance companies, benefit, group RRSP and pension plan administrators for enrolment in and administration of benefits, plans and claims;
- teacher certification information as per form I-2001 filed with the Ministry of Education;
- advisors to **[ABC School]** including accountants, lawyers and consultants;
- **[foundations / any related entities]** of **[ABC School]** as reasonably required by the operations of **[ABC School]** and the **[foundation and related entity]**;
- when required or permitted by law.

[NOTE: The above list should be reviewed to ensure disclosures are applicable. All disclosures of personal information about employees and volunteers should be listed.]

Personal information about volunteers may be disclosed for the purposes of establishing and managing an effective volunteer program and for other purposes identified when the information is collected. Information may also be disclosed when required or permitted by law.

[NOTE: The above list should be reviewed to ensure disclosures are applicable. All disclosures of personal information about volunteers should be listed.]

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

Outside Service Suppliers

At **[ABC School]**, the school sometimes contacts outside organizations to perform specialized services such as printing, payroll services, 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 **[ABC 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 an individual wishes to limit the sharing of personal information as permitted by law, the individual must submit to the Privacy Officer a written letter specifying which items of personal information are to be limited and to whom these items are to be restricted. The Privacy Officer will advise the individual whether the requested information can be restricted in the manner requested.

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

[ABC School] will take appropriate steps to ensure that personal information collected by **[ABC School]** is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used or disclosed. Employees and volunteers are responsible for providing up-to-date personal information to the school.

How May I Update Outdated or Incorrect Information?

An individual may, upon written request to **[ABC School]**, request that **[ABC School]** correct an error or omission in any personal information that is under **[ABC School]**'s control and **[ABC 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

[ABC School] will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

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

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.

Employee Files

Employee files are stored in secured filing cabinets. Access to personal information is restricted to authorized employees who have a legitimate reason for accessing it.

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

[ABC School] will 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 **[ABC School]**.

Principle 9 - Individual Access

[ABC 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?

An employee or volunteer may access and verify any personal information with appropriate notice so that the office is able to supply the information required.

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.

APPENDIX

Suggestions for Language in Documents Used by Independent Schools for Employees and Volunteers as they pertain to the PIPA legislation.

January, 2004

Is There Sample Language for Use on Employee and Volunteer Forms?

Each school authority has its own procedures for recruiting and managing employees and volunteers. FISA suggests that when collecting personal information, appropriate language be included in forms and documents. The following is sample language:

The information collected on this form is collected, used and disclosed by **[ABC School]** in accordance with the Personal Information Privacy Policy For Employees and Volunteers of **[ABC School]**, a copy of which is available from the school's Privacy Officer.