

SCHOOL OPERATIONS

POLICY 5011

PERSONAL INFORMATION PRIVACY POLICY

FOR PARENTS AND STUDENTS

Catholic Independent Schools

Of

Nelson Diocese

Approved: November 2004

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St. Mary Elementary School, Cranbrook
St. Michael Elementary School, Trail
Holy Cross Elementary School, Penticton
St. Joseph Elementary School, Nelson
Immaculata Regional High School, Kelowna
St. Joseph Elementary School, Kelowna
Our Lady of Lourdes Elementary School, West Kelowna

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Catholic Independent Schools of Nelson Diocese
Operating Schools and Daycare Programs in the Nelson Diocese
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 the **CISND**. The schools are 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 the **CISND** regarding the collection, use and disclosure of personal information about students and parents, including the steps the schools have taken to ensure personal and financial information is handled appropriately and securely.

The **CISND** 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 view the most recent update of this Personal Information Privacy Policy on the diocesan website at www.cisnd.ca or pick up a copy at the school office. This Personal Information Privacy Policy may be supplemented or modified by agreements entered into between the **CISND** and an individual from time to time.

Ten Privacy Principles

As part of the **CISND's** commitment, the *Ten Privacy Principles* govern the actions of the schools as they relate to the use of personal information. This Personal Information Privacy Policy describes the *Ten Privacy Principles* and provides further details regarding the **CISND'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 **CISND**.

"Agent" means a person or company who has the authority to act for another (example: Nelson Diocese, superintendent, Ministry of Education, School Pastors)

"Contractor/service provider" means a person or business who agrees to do a work/service for the school or the **CISND** (example: school photographer, occupational therapist).

Principle 1 – Accountability

The **CISND** is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school **principal** is the designated individual in each school who is accountable for the school's compliance with the *Ten Privacy Principles*. This individual is the *Privacy Officer* of the school. Should the principal be away, their designate is accountable.

Principle 2 – Identifying Purposes

The **CISND** 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?

The **CISND** collects and uses personal information to provide students with the best possible educational services enunciated by the Mission statement of each school. Most of the information the schools collect comes 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. The **CISND** 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

The **CISND** 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, the **CISND** will take into account both the sensitivity of the personal information and the purposes for which the **CISND** 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 the **CISND**, an individual may withdraw consent to the collection, use or disclosure of his or her personal information. Upon notice of withdrawal of consent, the **CISND** will notify the individual of the likely consequences of withdrawing his or her consent and, except where otherwise required or permitted by law, **CISND** will stop collecting, using or disclosing the personal information as requested.

If a person provides **CISND** 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 the **CISND** to collect, use and disclose such personal information for the purposes set forth in this Personal Information Privacy Policy.

Principle 4 – Limiting Collection

CISND will limit the personal information collected to that information necessary for the purposes identified by the school.

Principle 5 – Use, Disclosure and Retention

The **CISND** 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?

CISND 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.

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.

The **CISND** may use anonymous information, such as information collected through surveys or statistical information regarding students, to constantly improve our schools.

When Information May be Disclosed?

The **CISND** 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 **CISND** 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.
- Other professionals for the sole purpose of supporting the student (i.e. speech and language pathologist, occupational therapist, doctor, psychologist, community counsellor)
NOTE: see sample release form attached.

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

The **CISND** sometimes contacts outside organizations to perform specialized services such as printing, student assessments, market research or data processing. For example, the school gives the yearbook publisher the information required to produce the annual yearbook; the newspaper pictures of school events, the photography company the names of students, the health unit necessary information to ensure safe health practices for students with medical issues, the church the home contact information for sacramental preparation purposes, the PSG home contact information for the school directory, school alumni groups. Suppliers of specialized services are given only the information necessary to perform those services, and **CISND** 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

The **CISND** will take appropriate steps to ensure that personal information collected by the **CISND** 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 the **CISND**, request that the **CISND** correct an error or omission in any personal information that is under the **CISND**'s control and the **CISND** will, as appropriate, amend the information as requested. If requested by you, the **CISND** will 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

The **CISND** 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 financial 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, counsellors, 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

The **CISND** 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 the school.

Principle 9 – Individual Access

The **CISND** 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

With parent permission, a high school student of age 16 or older may access and verify school records in his/her file.

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 CISND Schools for Parents and Students as they pertain to the PIPA legislation (January 2004)

Sample Language for Use on Student Registration Forms?

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

Consent to disclosure of Personal Information

I consent to having the **CISND** collect personal information that may include student identification information, birth certificate, legal guardianship, court orders if applicable, parents' work numbers and email 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 the **CISND**:

1. for the purpose of establishing, maintaining, and terminating the student's or parent's relationship with the **CISND**
2. for additional purposes identified when or before personal information is collected, and
3. as otherwise provided in the **CISND's** Personal Information Privacy Policy, a copy of which is available on the CISND website www.cisnd.ca .

I also consent to the collection, use and disclosure of such personal information by and to agents, contractors and service providers of the **CISND**.

This information is required in order to register your child at this school and assist the school authority (CISND) 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 the school is the principal; he/she may be reached at the school during hours of operation.

Signature: _____ Date: _____

Consent to the Use of Student Work and Pictures

I consent to having photographs and work samples of my child(ren) used by the **CISND** in the yearbook, newsletters and other promotional material (not including website promotions).

Signature: _____ Date: _____

Consent for Picture and/or Name on CISND Websites (school and diocese)

I consent to having:

- **my child's name only** yes ____ no ____
- **my child's picture only** yes ____ no ____
- **my child's name and picture together** yes ____ no ____

on the school/diocesan website for promotional reasons.

Signature: _____ Date: _____

Consent for Family Information in School Directory

The school may prepare a family phone list (car pool list, class list, etc.) for a family contact directory. I consent to having the following information placed in the family directory:

- Parent and student names yes ____ no ____
- Contact Information yes ____ no ____
(contact information includes:
home phone, home address, parent email address)

Signature: _____ Date: _____

Sample Language for Parent Personal Information

The CISND recommends 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:

Disclosure of Parent Information in Event of an Accident

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: _____

CISND Acknowledgement for the Release and Storage of Parent Personal Information

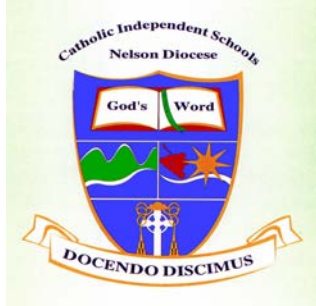
The CISND acknowledges that there will be no disclosure of personal information to unauthorized personnel or third parties who are not directly involved in school management or the care, supervision and instruction of your child(ren) at this school, unless written authorization from a parent or legal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

Signature: _____
principal signature (Privacy Officer)

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.



OFFICE OF THE SUPERINTENDENT
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superintendent@cisnd.ca

AUTHORIZATION FOR RELEASE OF EDUCATIONAL INFORMATION

I (parent/guardian) give my permission for:

School Name: _____

School Address: _____

To receive and release information as may be required for my child's/children's schooling to:

Name of Parent

Name of Student

Signature of Parent

Date

CRANBROOK St. Mary's Elementary School	KELOWNA St. Joseph Elementary School	KELOWNA Immaculata Regional High School	NELSON St. Joseph Elementary School	PENTICTON Holy Cross Elementary School	TRAIL St. Michael's Elementary School	WEST KELOWNA Our Lady of Lourdes Elementary School
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