

Privacy Principles

St. Christopher's Montessori School ("StCMS") is committed to safeguarding the personal information entrusted to us by parents of students attending StCMS ("Parents"). We manage personal information in accordance with British Columbia's *Personal Information Protection Act* (PIPA), which sets out how private-sector organizations in B.C. can collect, use and disclose personal information. This policy outlines the principles and practices we follow in protecting personal information after we collect it and how you can request access to personal information under our control.

This policy applies to StCMS, Queenswood Montessori Society, its subsidiaries and to any service provider collecting, using or disclosing personal information on our behalf.

You may forward any questions about our privacy policy or compliance with PIPA to our Principal (you will find this contact information at the end of this policy).

Definitions used in this policy

Personal information means information about an identifiable individual, for example, an individual's name, home address and phone number, e-mail address, age, sex, image, marital or family status and medical information.

The Principal is the individual responsible for ensuring that we comply with this privacy policy and PIPA.

OIPC is the Office of the Information and Privacy Commissioner for British Columbia.

What personal information do we collect?

We collect only the amount and type of personal information that we need for the purpose of providing services to students of StCMS ("Students"), Parents, Vancouver Island Health Authority ("VIHA") and the Ministry of Education. These are our reasonable purposes for collecting personal information:

- To deliver requested products and services.
- To confirm identity when processing a payment.
- To meet regulatory requirements for VIHA licensing and the Ministry of Education.
- To compile and distribute a school directory.
- To communicate to the membership through emails with newsletters and school information.

We may collect the following types of personal information to fulfill the above purposes:

- Name, address, phone number, email address, marital status
- Contact or identification information, including Student's photo.
- Banking information.
- Student's MSP number, medical information, gender and history
- Student's Birth Certificate and Parents' residency status

We normally collect Student and Parent information from the Parent. We may collect information from other persons with your consent or as authorized by law.

We inform the Parents before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we will not provide notification is when information is volunteered for an obvious purpose (for example, producing a credit card to pay a fee when the information will be used only to process the payment).

Consent and notification

We ask for your consent to collect, use or disclose personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume consent in cases where information is volunteered information for an obvious purpose.

We assume consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask for consent orally (in person, by telephone), in writing (by signing a consent form), or electronically (by email).

In cases that do not involve sensitive personal information, we may rely on "opt-out" consent. For example, we may use your contact information for our School Directory, names/photos for the Press at school events and posting of photos within the School. In this situation, we will give you an opportunity to opt-out by checking an appropriate box on our Student Information form.

When we tell you the purpose for collecting your personal information, we will give you an opportunity to refuse to provide it. You may also withdraw consent to the use and disclosure of your personal information at any time with reasonable notice, unless the personal information is necessary for us to provide our services or fulfill our legal obligations. If your decision to refuse or withdraw consent restricts our ability to provide a particular product or service, we will explain this to you to assist you in deciding whether to consent.

We may collect, use or disclose personal information without your knowledge or consent only as authorized by law. For example, we may not request consent in the following circumstances:

- In an emergency that threatens an individual's health or personal security.
- When the personal information is available from a telephone directory.

How do we use and disclose personal information?

We use and disclose personal information only for the purpose for which we collected the personal information, except as authorized by law. We only use and disclose the amount and type of personal information that is reasonable to meet the purposes we have identified to you at the time of collection. For example, if we collect your name and home address and email for our School Directory, we will not use that information for marketing purposes without your consent.

If we wish to use or disclose your personal information for any new business purpose, we will identify that purpose to you and ask for your consent.

How do we safeguard personal information?

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification or disposal of personal information, as well as any unauthorized access to personal information.

How we protect personal information in our custody

We use the following security measures to ensure your personal information is appropriately protected when in our custody:

- Secure all documents containing personal information in locked filing cabinets
- Restrict employee access

- All school wide emails are sent under 'Blind copy' to prevent disclosure of individual email addresses of Parents

When we retain another organization to do work for us, we ensure there is an agreement in place that commits the other organization to adhere to our privacy policy and privacy law.

How we dispose of personal information

We use the following security measures to ensure your personal information is appropriately destroyed:

- Shredding documents
- Deleting electronically-stored information

How long we retain personal information

We retain Student and Parent personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes. If we make a decision based on personal information, we retain that information for a period of one year to allow you a reasonable opportunity to request access to it.

How can you request access to or corrections of your personal information?

Correction requests

We make every reasonable effort to ensure that Student and Parent information is accurate and complete where it may be used to make a decision about our Students or where it is disclosed to another organization. We rely on Parents to notify us if there is a change to their personal information that may affect their relationship with our organization.

If you are aware of an error in our information about you or your child, you have the right to make a request for correction. You can request a correction by writing to our Principal (you will find contact information for our Principal at the end of this policy). Your written request must include enough information for us to be able to identify the personal information and the correction you seek. We will not charge you a fee for your correction request.

If we agree that the personal information is inaccurate or incomplete, we will correct the information and send the corrected information to any organization we have disclosed the incorrect information to in the previous year. We will also alert any organization we disclosed the incorrect information to during the previous year about the correction. If we do not correct your personal information, we will note your requested correction on the copies of the personal information we have under our control.

Access requests

Students and Parents have a right to access their own personal information under our control, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual. We will make every reasonable effort to respond to your request for access as accurately and completely as possible.

You may make a request for access to your personal information by writing to our Principal (you will find contact information for our Principal at the end of this policy). Your written request must include enough information to allow us to identify the information you are seeking. You may also request information about how we use your personal information and to whom we disclose or have disclosed it.

We will respond to your request within 30 business days or provide you with a written notice of extension if we need additional time to fulfill your request. We may require an extension depending on the amount of information you have provided through your request, the amount of information you have requested or that we have to search, or when we need to consult a third party about whether we should grant your request. If we require an extension, we will tell you the reason for the extension, when you can expect our response, and how to contact the OIPC if you wish to make a complaint.

If it is not reasonably possible for us to provide you with the personal information, we will provide you with an opportunity to examine it on site.

We may charge a minimal fee to provide personal information. We will provide you with a written estimate before beginning to process your request.

In some circumstances, we may be legally authorized or required not to disclose information. For example, we may refuse access to personal information if disclosure would reveal confidential business information.

If we refuse a request in whole or in part, we will notify you in writing, providing the reasons for the refusal, who you can contact about the refusal, and information on how to contact the OIPC to request a review of our decision. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by StCMS, our compliance with PIPA or have a request for access or correction to your own personal information, please contact the Principal:

Principal
St. Christopher's Montessori School
2619 Currie Road,
Victoria, BC V8S 3B9
250-595-3213 or stcms@shaw.ca

We will make every reasonable effort to thoroughly investigate and respond to your complaint in a timely fashion.

If you are not satisfied with our response to your complaint, request for access or any other concern regarding our compliance with PIPA, you should contact the OIPC.

Office of the Information and Privacy Commissioner for British Columbia

PO Box 9038 Stn. Prov. Govt.
Victoria, BC V8W 9A4

Phone: (250) 387-5629
E-mail: info@oipc.bc.ca

Facsimile: (250) 387-1696
Web site: www.oipc.bc.ca

For toll-free access, call Enquiry BC at (604) 660-2421 (in Vancouver) or 1-800-663-7867 (elsewhere in B.C.) and request a transfer to (250) 387-5629.

Privacy policy - Employee & Volunteer Personal Information

Employee personal information

Employee personal information is information that is collected, used or disclosed for purposes required to establish, maintain, manage or terminate an employment relationship between an employee (including a volunteer) and an organization. This may include information such as name, home address, educational history and employment history.

How do we collect, use and disclose employee personal information?

If you are an employee of our organization, we can collect, use and disclose your employee personal information without your consent only for the purposes of establishing, managing or terminating the employment or volunteer relationship. Unless otherwise authorized by law, we will provide employees and volunteers with prior notice about the collection, use or disclosure of employee personal information, along with information about the purposes.

What employee personal information do we collect, use and disclose?

We collect, use and disclose employee personal information to meet the following purposes:

- To determine eligibility for employment or volunteer work.
- To establish training and development requirements.
- To assess performance and manage performance issues if they arise.
- To administer pay and benefits.
- To process employee work related claims, such as health care benefits.

We only collect, use and disclose the amount and type of employee personal information that is reasonable to meet the above purposes. The following is a list of employee personal information that we may collect, use and disclose to meet those purposes:

- Criminal background or police records checks.
- Human resources materials as resumes, reference information, interview notes, letters of offer and acceptance, policy acknowledgement forms, emergency contacts or workplace performance evaluations.
- Benefit information such as forms relating to applications to insurance benefits
- Financial information, such as cheque deposit information and tax information.

We will inform our employees and volunteers of any new purpose for which we will collect, use or disclose employee personal information and will obtain your where required.

We will obtain your consent to collect, use and disclose your personal information for other purposes unrelated to the employment or volunteer relationship. For example, if you have consented, we may use your personal contact information when registering for professional organization memberships or workshops.

Access to employee personal information

We do not charge our employees any fee for requesting access to their employee personal information.