

Section:	Administration
Policy:	5.23
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5.23 PIPA Policy

1. Rationale

The School's Commitment

Safeguarding personal information of parents and students is a fundamental concern of Kootenay Christian Academy. 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 is intended to explain the current legislation which is designed to protect your privacy, to regulate the use and collection of information, and to state the steps the school has taken to ensure your personal and financial information is handled appropriately and securely

Privacy Protection in British Columbia

The Act requires an organization to obtain informed consent from an individual before collecting personal information about that individual, with certain exemptions. The organization must state why it is collecting the information, and how it will use the information collected. The Act also requires the organization to keep the information it has collected in a secure and safe manner, protecting the individual's right to have his or her information protected. The Act also describes with whom the personal information may be shared.

Note: Kootenay Christian Academy does not fall under the **Freedom of Information and Protection of Privacy Act (FOIPPA)**, which applies only to provincial government and its bodies; neither does it fall under the **Protection of Personal Information and Electronic Documents Act (PIPEDA)**, a federal statute.

2. 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 Kootenay Christian Academy.

3. Ten Privacy Principles

As part of Kootenay Christian Academy'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

Kootenay Christian Academy's School is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school designates an individual who is accountable for the school's compliance with the Ten Privacy Principles. This individual is the Privacy Officer of the school and it is the school principal.

Principle 2 – Identifying Purposes

Kootenay Christian Academy's School will identify the purposes for which personal information is collected before or at the time the information is collected.

Principle 3 – Consent

Kootenay Christian Academy 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.

Principle 4 – Limiting Collection

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

Principle 5 – Use, Disclosure and Retention

Kootenay Christian Academy 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

Kootenay Christian Academy's School will maintain personal information as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

Principle 7 – Safeguarding Personal Information

Kootenay Christian Academy's School will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

Principle 8 – Openness

Kootenay Christian Academy's School will make information available to individuals concerning the policies and practices that apply to the management of their information.

Principle 9 – Individual Access

Kootenay Christian Academy's 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 questions or enquiries with respect to the school's privacy policies or practices to the Privacy Officer of Kootenay Christian Academy.

4. How is Information Used?

Kootenay Christian Academy School uses:

- personal information to communicate with families, process applications and provide educational services and co-curricular programs.
- 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 volunteer participation and fundraising.
- anonymous/personal information to constantly improve our 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 seek consent before the school proceeds.

5. When May Information be Disclosed?

Kootenay Christian Academy's 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.

When Authorized

- Other educational institutions routinely contact the school for personal information about students. For example, if a child moves to another school, college or university, student records are requested by the enrolling institution. Permission to pass on these records is obtained as part of the School's registration process.
- 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.

In some cases, when communication is over the telephone, consent to the use and/or disclosure of information will be obtained verbally. In other cases, such as communication through e-mail, 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 ensure the authorities making the request have authorization 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 will be disclosed.

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.

All employees of Kootenay Christian Academy's School are required to abide by the privacy standards governed under PIPA. They are also required to work within the principles of ethical behavior as set out in employment contracts and must follow all applicable laws and regulations. Employees are informed about the importance of privacy and security of personal information.

Outside Service Suppliers

At Kootenay Christian Academy's 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: however, if a family has not signed the appropriate release form, the student information will not be released.

6. Safeguarding School Information

Kootenay Christian Academy has security procedures in place to ensure personal and financial information is protected against unauthorized access, disclosure, inappropriate alteration or misuse.

Student Files

Student files are stored in a locked room 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. The student files cannot be removed from the secured viewing area.

Electronic Security

The school manages electronic files 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 your information is not compromised.

Record Management

Personal information is destroyed, in accordance with PIPA legislation, one year after the school no longer needs the information or one year after legal minimum retention requirements have been met.

7. Accessing and Amending Information

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

Accessing Your Information

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

Accessing Student Information

Student files may be accessed following PIPA requirements with appropriate notice during regular school hours. In situations of family breakdown, the school will grant access to records of children as determined by judicial review.

Questions about privacy, confidentiality and information handling of the school may be addressed to the school's Privacy Officer by calling the school office.