



PERSONAL INFORMATION PRIVACY POLICY FOR EMPLOYEES AND VOLUNTEERS

**St. Bernadette School
13130-65B Avenue
Surrey, BC**

Table of Contents

TABLE OF CONTENTS	2
THE SCHOOL'S COMMITMENT TO YOU	3
PRIVACY PROTECTION IN BRITISH COLUMBIA	3
TEN PRIVACY PRINCIPLES	3
WHAT INFORMATION IS COLLECTED?	4
HOW IS INFORMATION USED?	5
WHEN MAY INFORMATION BE DISCLOSED?	5
HOW DOES THE SCHOOL SAFEGUARD INFORMATION?	6
ACCESSING AND AMENDING INFORMATION	6
QUESTIONS, CONCERNS AND COMPLAINTS	7

St. Bernadette School PERSONAL INFORMATION PRIVACY POLICY FOR EMPLOYEES AND VOLUNTEERS

The School's Commitment to You

Safeguarding your confidentiality and protecting your personal information is a fundamental concern of St. Bernadette School. The school is committed to meeting or exceeding the privacy standards established by the BC *Personal Information Protection Act (PIPA)*

This personal information privacy policy is intended to explain to you 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. The school may collect information about you without your consent to establish, manage or terminate the employer-employee relationship.

Note: St. Bernadette School 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.

Under *PIPA*, employees and volunteers are considered to be in the same category. Therefore this document describes concepts and procedures that apply equally to both an employee and a volunteer.

Ten Privacy Principles

As part of St. Bernadette School'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

St. Bernadette 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 Manager* of the school.

Principle 2 – Identifying Purposes

St. Bernadette School will identify the purposes for which personal information is collected before or at the time the information is collected.

Principle 3 – Consent

St. Bernadette 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. The school may collect information about you without your consent to establish, manage or terminate the employer-employee relationship.

Principle 4 – Limiting Collection

St. Bernadette School will limit the personal information collected to those details necessary for the purposes identified by the school.

Principle 5 – Use, Disclosure and Retention

St. Bernadette 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. Personal information will only be retained for the period of time required to fulfill the purpose for which it was collected.

Principle 6 – Accuracy

St. Bernadette 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

St. Bernadette School will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

Principle 8 – Openness

St. Bernadette School will make information available to individuals concerning the policies and practices that apply to the management of their information.

Principle 9 – Individual Access

St. Bernadette 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 Manager of St. Bernadette School.

What Information is Collected?

St. Bernadette School gathers and uses personal information from workers for the purposes of establishing an employer-employee relationship. Personal information is gathered from volunteers to enable the school to coordinate an effective volunteer program that provides good communication and direction. Most of the information the school collects comes to the school directly from you, and only with your consent.

When you apply to be employed, the school will ask you to provide the information that enables it to complete the hiring process. This process may also include information on academic, health, and personal matters needed by the school to provide evidence for hiring the best candidate for the vacancy. Upon being hired, you may be asked to provide additional information about yourself for the purposes of payroll, benefits coverage, income tax T4, government audits, etc.

During your employment, the Act allows the employer to collect information about you without your consent to establish, manage or terminate the employment relationship between you and your employer. However, the employer must notify you that such information is being collected.

How is Information Used ?

St. Bernadette School uses:

- personal information to communicate with you, process payroll and benefits and ultimately to provide you with the employee services and benefits that you expect.
- personal information to enable the school to operate its administrative function, including payment of taxes 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 maintain the employment relationship.

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

When May Information be Disclosed ?

St. Bernadette 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 by You

- Other institutions may contact the school for personal information about employees. For example, if you have applied for a bank loan or mortgage, the bank will require personal information about your term of service, salary, etc. Your permission to pass on these records is to be provided in writing to the privacy manager of the school.
- 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. By volunteering your services to the school, you understand that your personal information such as phone number, address, etc. may be shared with others.

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 court issues, legal proceedings, court orders and government tax reporting requirements. Teacher certification information as per Form I2001 is annually filed with 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, 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.

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, the bookkeeper will have access to personal information about you and your personal financial information.

All employees of St. Bernadette School are required to abide by the privacy standards governed under **PIPA**. You will be required to work within the principles of ethical behavior as set out in employment contracts and you must follow all applicable laws and regulations. You will be well informed about the importance of privacy and you will be required to sign either a code of conduct or a confidentiality agreement that prohibits the disclosure of any personal information to unauthorized individuals or parties. To reinforce your understanding and commitment to upholding privacy and confidentiality, you will periodically receive up-to-date literature about our privacy policy, principles and standards.

Outside Service Suppliers

At St. Bernadette School, the school sometimes contacts outside organizations to perform specialized services such as printing, staff training, market research or data processing. Suppliers of specialized services are given only the information necessary to perform those services.

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 Does The School Safeguard Information ?

St. Bernadette School maintains current security standards to ensure that your personal and financial information is protected against unauthorized access, disclosure, inappropriate alteration or misuse.

Employee Files

Employee files are stored in secured filing cabinets. Access is restricted to only those employees (principal, vice-principal, secretary, bookkeeper, 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 your information is not compromised.

Record Management

Personal information is destroyed one year after the school no longer needs the information or one year after legal minimum retention requirements have been met. Employment and volunteer records will be retained according to the policy of the authority.

Accessing and Amending Information

St. Bernadette 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 appropriate notice so that the office is able to supply you with the information you require. Most of this information is available in the employee or volunteer forms that you filled out.

Amending Your Information

To help the school keep your personal information up-to-date, the school encourages you to request the school to amend inaccuracies and make corrections. Where appropriate, the school will communicate these changes to other parties who may have unintentionally received incorrect information from the school.

Questions, Concerns and Complaints

The school may add, modify or remove portions of this policy when it is considered appropriate to do so. You may ask for the most recent update of this policy at the school office.

Questions, concerns, and complaints about privacy, confidentiality and information handling of the school may be addressed to the school's Privacy Manager by calling the school office. If necessary, you will be referred to use the school's complaint procedure and appeals policies.