

Section 100: General Administration

Policy #102: QMS Personal Information Privacy Policy for Parents & Students

A. POLICY

Safeguarding personal information of parents and students is a fundamental concern of Queen Margaret's 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.

B. PROCEDURE

1. Scope

This policy affects all parents and students (past and present) of QMS who submit personal information to the school for admissions, finance, donation, or other purposes.

2. Authority

It is the responsibility of the Head of School and designated Privacy Offices to ensure this policy is adhered to.

3. Procedures/Definitions:

This Personal Information Privacy Policy describes the policies and practices of Queen Margaret's School regarding the collection, use and disclosure of personal information about students and parents, including the steps the school has taken to ensure personal and financial information is handled appropriately and securely.

Queen Margaret's 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. You may ask for the most recent update of this Personal Information Privacy Policy at the school office. This Personal Information Privacy Policy may be supplemented or modified by agreements entered into between Queen Margaret's School and an individual from time to time.

As part of Queen Margaret's 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 Queen Margaret's School'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

Submitted by: Wilma Jamieson, Head of School

Date Approved: December 11, 2014

Date Last Reviewed: December 11, 2014



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 **Queen Margaret’s School**.

Principle 1 – Accountability

Queen Margaret’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.

You may contact our Privacy Officer as follows:

Queen Margaret’s School

Attention: Mrs. Leanne Schultz

Address: 660 Brownsey Avenue

Phone: 250-746-4185

Fax: 250-746-4187

Email: lschultz@qms.bc.ca

Principle 2 – Identifying Purposes

Queen Margaret’s School will, before or at the time personal information is collected, identify the purposes for which the information is collected, used and disclosed.

2.1 What Information is Collected

Queen Margaret’s School collects and uses personal information to provide students with the best possible educational services enunciated by the Mission statement of the school. Most of the information the school collects 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. Queen Margaret’s School also collects information in connection with the use of its computer systems.

Principle 3 – Consent

Queen Margaret’s 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.

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, Queen Margaret’s School will take into account both the sensitivity of the personal information and the purposes for which Queen Margaret’s School will use the information. Consent may be express, implied (including through the use of “opt-out” consent where appropriate), or deemed. All parents will be asked to complete a “Consent for Use of Personal Information” form on behalf of their child.

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On giving reasonable written notice to Queen Margaret's School, an individual may withdraw consent to the collection, use or disclosure of his or her personal information. Upon notice of withdrawal of consent, Queen Margaret's School will notify the individual of the likely consequences of withdrawing his or her consent and, except where otherwise required or permitted by law, Queen Margaret's School will stop collecting, using or disclosing the personal information as requested.

If a person provides Queen Margaret's School 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 Queen Margaret's School to collect, use and disclose such personal information for the purposes set forth in this Personal Information Privacy Policy.

Principle 4 – Limiting Collection

Queen Margaret's School will limit the personal information collected to that information necessary for the purposes identified by the school.

Principle 5 – Use, Disclosure and Retention

Queen Margaret's 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.

5.1 How is Information Used

Queen Margaret's School 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.
- To share specific health, psychological, or legal information to provide certain specialized services in those areas or as adjunct information in delivering educational services.
- For the purposes of advancement and development office and alumni relations;
- In the course of the school's activities including in publications such as yearbooks and newsletters and websites;
- In the operation and maintenance of computer and e-mail systems in accordance with Policy #528 *Information & Communication Technology (ICT): Access and Acceptable Use*, and Policy #527: *Cloud Computing, Photographic Images and Social Media* as applicable.

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. Queen Margaret's School may use anonymous information, such as information collected through surveys or statistical information regarding students, to constantly improve our school.

5.2 When May Information be Disclosed?

Queen Margaret's 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. The following are some examples of how **Queen Margaret's School** may disclose personal information.

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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, marketing and promotional materials, annual general meetings, etc.

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

At Queen Margaret's School, the school sometimes contacts outside organizations to perform specialized services such as printing, student assessments, market research or data processing. Suppliers of specialized services are given only the information necessary to perform those services, and Queen Margaret's 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 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.

5.3 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.

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Principle 6 – Accuracy

Queen Margaret's School will take appropriate steps to ensure that personal information collected by Queen Margaret's School is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used or disclosed.

6.1 How May I Update Outdated or Incorrect Information

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

Queen Margaret's School will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

7.1 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. 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.

7.2 Student Files

Student files are stored 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.

7.3 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

Queen Margaret's 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 Queen Margaret's School.

Principle 9 – Individual Access

Queen Margaret's 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.

9.1 How May a Parent Access their Personal Information?

Individuals may access and verify any personal information by providing written notice so that the office is able to supply the information required. A minimum of two business days is required.

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9.2 Parent Access to Student Personal Information

A parent may access and verify school records of the student, with appropriate written notice during normal school hours. A minimum of two business days is requested. In situations of family breakdown, the school will grant access to records of students in accordance with the law.

9.3 Student Access to Student Personal Information

Upon reaching the age of majority, or with the written consent of the parents, a student may access his / her school records with appropriate written notice during normal school hours. A minimum of two business days is requested.

Principle 10 – Complaint Process

Individuals may question compliance with the above principles. 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.

4. Communications Process

This policy will be communicated to the school community through the school's website, direct emails and distribution of accompanying consent forms.

6. Related Forms

Form 102 – *Consent for Use of Personal Information Form* (Student Forms Package)

Policy #527 – *Cloud Computing and Photographic Images and Social Media*

Form 527-A – *Consent for Cloud Computing and Photographic Images and Social Media*

Policy #528 – *Information & Communication Technology (ICT): Access and Acceptable Use*

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