

Web edition

PERSONAL INFORMATION PRIVACY POLICY

FOR PARENTS AND STUDENTS

Of

Heritage Christian School

907 Badke Road, Kelowna BC

Table of Contents

Definitions	2
The School's Commitment to You	3
Ten Privacy Principles	4
<i>Principle One - Accountability</i>	4
<i>Principle Two - Identifying Purposes</i>	4
<i>Principle Three - Consent</i>	5
<i>Principle Four - Limiting Collection</i>	5
<i>Principle Five - Use, Disclosure and Retention</i>	5
<i>Principle Six - Accuracy</i>	6
<i>Principle Seven - Safeguarding Personal Information</i>	6
<i>Principle Eight - Openness</i>	7
<i>Principle Nine - Individual Access</i>	7
<i>Principle Ten - Complaint Process</i>	8

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 Heritage Christian School.

“**the school**” means Heritage Christian School and it’s parent Kelowna Christian Center Society.

Heritage Christian School
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Updated March 2016

Heritage Christian School (HCS) prides itself on being an organization that connects people to Jesus and one another. A large part of how the school does this is by honoring God's Ten Commandments and Biblical rules. Romans 13: 1-7 reads, "Let everyone be subject to the governing authorities, for there is no authority except that which God has established. The authorities that exist have been established by God." Therefore, HCS strives to uphold Federation of Independent School Associations (FISA) standards as they are the governing body regarding this Personal Information Protection Act (PIPA). HCS' Personal Information Privacy Policy (PIPP) details procedures and guidelines so that the highest confidence can be had by all regarding confidential information. Matthew 7:12 states, "So in everything, do to others what you would have them do to you, for this sums up the Law and the Prophets." Accordingly, Romans 12:10 mentions, "be devoted to one another in love. Honor one another above yourselves." Through utilizing the privacy officer and employing the strong ethics and morals found within the Christian staff at HCS all individuals will diligently strive to uphold the principles set by this privacy policy. Lastly, Titus 2:7 declares, "In everything set them an example by doing what is good. In your teaching show integrity, seriousness." A large part of HCS' focus has always been on loving God and loving people and this PIPP honors FISA's recommendations as well as incorporating the Christian mission and values of the organization.

The School's Commitment to You

HCS' PIPP details 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.

HCS may add, modify or remove portions of this PIPP 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 PIPP at the school office. This document may be supplemented or modified by agreements entered into between HCS and an individual, group, or organization(s) from time to time.

Ten Privacy Principles

As part of HCS' commitment, the Ten Privacy Principles govern the actions of the school as they relate to the use of personal information. This PIPP describes the Ten Privacy Principles and provides further details regarding HCS' compliance with the principles.

Principle One - Accountability

HCS is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school has designated a privacy officer, who is accountable for the school's compliance with these policies. Individuals (including parents, students, employees and others) can have access to their personal information by contacting the privacy officer through various ways such as telephone, letter, e-mail, etc. Once both parties reach an agreed upon date and time the office and its staff member(s) will ensure that the file is ready and held in a confidential room. Additionally, if the request by a party is made on behalf of a legal representative such as a lawyer through telephone, letter, e-mail, etc. an unofficial folder will be sent to the lawyer with relevant photo-copies attached.

You may contact our privacy officer as follows:

Heritage Christian School

Attn: Steve Cox, privacy officer

Address: 907 Badke Road, Kelowna, B.C., V1X 5Z5

Phone: 1 (250) 862-2377

Fax: 1 (250) 862-4943

Email: office@heritagechristian.ca

Principle Two - Identifying Purposes

HCS will, before or at the time personal information is collected, identify the purposes for which the information is collected, used and disclosed.

The school collects and uses personal information to provide students with the best possible Christ-centred education including Christian educators, curriculum, and environment. 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. This also includes information on academic, health, and personal matters needed by the school to provide the best possible education and co-curricular programs. HCS also collects information in connection with the use of its computer systems. HCS fully applies and enforces all of PIPA's guidelines and regulations. Therefore, although individuals are entitled to access their own personal information the school ensures that individuals are not able to access personal information about others. This is in large part controlled by the privacy officer as all requests for access to personal information are done through this individual and/or the HCS office.

Principle Three - Consent

HCS 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.

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

If a person provides HCS 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 school to collect, use and disclose such personal information for the purposes set forth in this PIPP.

Principle Four - Limiting Collection

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

Principle Five - Use, Disclosure and Retention

HCS 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. If for any reason personal information is required to fulfill another purpose, the school will, where appropriate, notify parents and staff and ask for consent before the school proceeds. Collecting, using and disclosing personal information only with the consent of the individual is addressed on HCS' enrolment form.

HCS uses personal information to communicate with parents, process applications, provide educational services, offer co-curricular programs, operate administrative functions, as well as to aid in specialized services such as health, psychological, and legal information. HCS 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. Disclosure of personal information will also occur depending upon the surrounding conditions: when authorized by the individual himself/herself, when required by law, when permitted by law, and when HCS is contacted by outside service suppliers.

Retention regarding the files of employees will be kept on file for 25 years.

With respect to the files of elementary students, when a child transfers to another school his or her file will be sent from the previous school to the current school. If a child graduates from HCS the file will remain at HCS. Elementary students the file will follow the child or remain at HCS until they graduate. Documents containing personal information or documents with reference that can be associated to particular individuals will be destroyed as soon as the purpose for which the personal information was collected is no longer being served and retention is no longer necessary for legal or business services. Ultimately, the privacy officer will determine the most optimal way for the demise of the information. However, in some cases such as in regards to official letters of suspension these documents must remain in HCS' files. Although PIPA permits the collection, use and disclosure of "employee personal information" without the consent of the individual solely for the purposes reasonably required to establish, manage or terminate an employment relationship between the organization and the individual, some information about employees may not fall within such exception and, accordingly, consent of employees may be required to collect, use or disclose such information.

Restricting Sharing Information

If one chooses to limit the sharing of their personal information, they must contact the school office and submit a written letter specifying which items of personal information they wish to limit, and to whom they wish these items to be restricted. Please, remember that certain agencies, by law, have access to certain types of personal information.

Retention of Personal Information

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 for legal or business purposes, it will be destroyed or made anonymous.

Principle Six - Accuracy

HCS will take appropriate steps to ensure that personal information collected by the school is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used or disclosed. If an error or omission does occur an individual may contact HCS upon written request. As appropriate, HCS will amend the information and send the corrected personal information to each third party to which it had disclosed the information during the preceding year.

Principle Seven - Safeguarding Personal Information

HCS will protect personal information by security safeguards that are appropriate to the sensitivity level of the information. In regards to the school's employees, 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 this PIPP document regarding handling of personal information.

Student Files

Student files are stored in secure filing cabinets. Access is restricted to only those employees 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.

Principle 8 – Openness

HCS 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.

Principle 9 – Individual Access

HCS 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. Additionally, 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 the individuals of HCS have completed.

Parent Access to Student Personal Information

A parent/guardian 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

Students or minors may also access their personal information through the same channel as the *Parent Access to Student Personal Information* guideline depicted above . A parent/guardian must accompany the student when viewing the files during a mutually agreed upon time between the privacy officer/HCS office.

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.