
Personal Information and Privacy Policy for Staff

Adopted: September 2004

Revised: June 2018

Revised: September 2026

Rationale:

The School is committed to ensuring the protection and security of all Personal Information within its control. The School recognizes the importance of privacy in relation to personal information it receives and maintains about employees, volunteers, and contracted service providers ("**Staff**"). The School is subject to comply with the BC [Personal Information Protection Act](#) ("**PIPA**"). And the School believes it is important to make every effort to ensure the accuracy, privacy, confidentiality, and security of such information in accordance with the PIPA. This Policy describes the principles the School will apply when protecting Staff personal information.

This policy applies to all employees, contractors, and volunteers of the School ("**Staff**"). All Staff are to recognize the importance of privacy in relation to personal information the School receives and maintains about employees, volunteers, and contracted service providers.

The administration of this Policy is the responsibility of the Head of School.

All school employees, contractors, and volunteers ("**Staff**") will follow the School's procedures for collecting, using, maintaining, and protecting Staff personal information.

Policy Statements	Regulations
1. This policy defines key privacy terms and responsibilities.	1.1 Personal information refers to any information about an identifiable individual that is collected, used, disclosed, or processed by the School in connection with the School's services, operations, or administration, but it does not include Staff contact information or work product information. 1.2 The Privacy Officer is the first point of contact in an organization when privacy issues arise. The person has the authority to intervene on privacy issues relating to any of your organization's operations. 1.3 A Privacy Breach is the theft or loss of or the collection, use, or disclosure of Personal Information not authorized by the BC <i>Personal Information Protection Act</i> (PIPA) and includes cyber and ransomware attacks and other situations where there are reasonable grounds to believe that any such unauthorized activities have

	taken place or there is a reasonable belief that they will take place. 1.4 For this purpose of this policy, “Staff” refers to employees, volunteers, contracted service providers and persons authorized to access student records when planning for, or delivering, health services, social services or other support services to a student of the School.
2. The Privacy Officer oversees the School's privacy compliance.	2.1 The Privacy Officer appointed by the Board is the Head of School. The Head of School may delegate these duties. 2.2 Maintaining the privacy and security of personal information is important to the School. The School and its Staff are accountable for the protection of the personal information within the School’s control, and the School will have a Privacy Officer who is responsible for implementing the School’s privacy management program and ensuring it complies with the PIPA and other applicable privacy laws. 2.3 Anyone with questions about how the School uses, processes, manages, and protects personal information may contact the School’s Privacy Officer for more information. The Privacy Officer can be reached at the School via the School’s phone number or email address (wrca@wrca.ca).
3. Staff personal information is managed for legitimate employment purposes.	3.1 The School is permitted to collect, use, and disclose personal information about staff where reasonably required in order to establish, manage, or end the employment/contract/volunteer relationship and for other purposes that are permitted under applicable laws. 3.2 If the School seeks to use staff personal information for other purposes, the School will ask for the individual’s consent before doing so unless otherwise permitted under the PIPA or other applicable laws. Consent may be expressed or implied and can be in written or verbal form. 3.3 When the staff member provides consent for the collection, use, or disclosure of their personal information, that consent can be withdrawn at any time, on reasonable notice. However, withdrawing consent may have an impact on the benefits, programs, or other services that the School is able to provide to the staff member. Consent cannot be withdrawn when disclosure is required by law (e.g., EI premiums, Teacher Regulation Branch). Questions about withdrawing consent should be directed to the School’s Privacy Officer.

	3.4 The School will endeavour to communicate the purposes for which personal information is collected at or before the time the information is collected. 3.5 In the ordinary course of operations, the School may collect the personal information of a staff member for the purposes of managing the School's relationship with that individual, including for the following purposes of: 3.5.1 recruiting and hiring; 3.5.2 improving and evaluating the School's programs and services; 3.5.3 staffing, scheduling, and business and service delivery purposes; 3.5.4 performance evaluation and monitoring; 3.5.5 promotion, demotion, and discipline; 3.5.6 investigating specific incidents involving employees; 3.5.7 payroll and benefits administration; 3.5.8 ensuring staff safety in the workplace; and 3.5.9 complying with the School's legal and regulatory obligations. 3.6 The School may disclose personal information about staff for these purposes or for other purposes permitted under applicable privacy laws, such as, where applicable, to the School's services and benefits providers, legal counsel, insurers, or law enforcement officials. The School will seek the staff member's consent for other uses of the individual's personal information where required under applicable laws. 3.7 The personal information the School may collect for these purposes includes information such as: 3.7.1 name, contact information, and social insurance number; 3.7.2 information about the staff member's employment history, education, and qualifications; 3.7.3 financial and banking information needed for payroll and benefits administration; 3.7.4 information about workplace performance, conduct, and attendance; 3.7.5 information related to investigations into workplace incidents; 3.7.6 information needed to respond to complaints or concerns; 3.7.7 information about the staff member's health and medical status if needed to manage and administer employment or employment related benefits; and
--	---

	3.7.8 other information that the School is required by law to maintain in order to manage its relationship with staff members or to comply with the School's legal obligations. 3.8 The School will make reasonable efforts to ensure that personal information is as accurate, complete, and current as required for the purposes for which it was collected. In some cases, the School may ask a staff member to assist in ensuring that the person's information is accurate and update-to-date.
4. Personal information and systems are protected through appropriate safeguards.	4.1 The School may employ technologies that track, monitor, and allow it to audit user activity on devices and electronic systems owned or operated by the School. While reasonable personal use of such systems and equipment may be permissible during off-duty hours, Staff who choose to use such devices and systems to conduct personal business should be aware of the privacy implications of doing so. The School's systems may automatically track, retain access, and use information about a user's online and system activity, including when undertaken for personal use. 4.2 While such information is tracked and monitored for system security and maintenance purposes, the School reserves the right to access and use such usage and browser history in order to address security incidents or investigate Staff misconduct (including inappropriate workplace activity and time theft) and other incidents. 4.3 The School shares personal information with the School's employees and contracted service providers who need to know such information for purposes related to the person's employment or engagement by the School, including the purposes described above and for legal, administrative, and operational purposes. Some of the School's service providers, including online service providers, may store personal information using cloud services inside or outside of Canada. 4.4 The School endeavours to limit the collection of personal information to what is necessary for the purposes for which it is collected, and the School retains personal information for only as long as it is needed for the delivery of services or for professional, legal, administrative or operational purposes. When it is no longer needed for these purposes, it will be securely destroyed.

	4.5 The School protects personal information by ensuring security safeguards appropriate to the sensitivity of the information are in place, including through the use of the following measures: 4.5.1 physical (i.e., locked filing cabinets, restricted access, appropriate security measures when disposing of personal information); 4.5.2 administrative (i.e., security clearances, access only on a “need to know” basis); 4.5.3 technological (i.e., passwords, firewalls, data disconnection from the internet, and regular backups) and training of employees; and 4.5.4 contractual, by requiring the School’s service providers to commit to appropriate standards of privacy and data security.
5. Staff may access, correct, and question their personal information.	5.1 A staff member has a right to access their personal information within the control of the School. The School will receive and respond to requests for access to personal information in accordance with the PIPA and other applicable laws. In some cases, the School may refuse access to certain records or information such as where the disclosure of information may threaten someone else's safety, mental or physical health, where disclosure could be harmful to the personal privacy of a third party, or in order to protect other important interests, but the School will only do so to the extent this is authorized by applicable laws. 5.2 A person also has a right to challenge the accuracy and completeness of their personal information that is collected by the School. The School will receive and respond to all such requests in accordance with the requirements of the PIPA. 5.3 If a person wishes to make a request for access or correction of their personal information, the person may do so by submitting a written request to the School’s Privacy Officer. 5.4 Questions, issues of concern or complaints about the processing or protection of a staff member’s personal information should be directed to the School’s Privacy Officer. The Privacy Officer will respond to and, where applicable, will investigate all complaints or concerns about violations of this Policy or other applicable privacy laws.

The school leadership team through consultation with the school staff developed this policy, and it was approved by the WRCA Board of Directors. It will be communicated to the school community and made available on the school website. The leadership team will review the policy and the WRCA Board of Directors will approve suggested revisions every two years.