
Personal Information Privacy Policy For Employees and Volunteers

Adopted: September 2004
Revised: June 2018

Introduction

Safeguarding personal information of employees and volunteers is a fundamental concern of White Rock 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, in compliance with PIPA outlines the principles and practices we will follow in protecting employees' and volunteers' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our employees' and volunteers' personal information and allowing our employees and volunteers to request access to, and correction of, their personal information.

White Rock Christian Academy may add, modify or remove portions of this Personal Information Privacy Policy when it is considered appropriate to do so, if it is not in conflict with legal requirements and government policy. You may ask for the most recent update of this Personal Information Privacy Policy at the school office.

Definitions

"Personal information" means information about an identifiable individual. Personal information does not include contact information or work product information.

"Contact information" means information that would enable an individual to be contacted at a place of business and includes 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. Contact information is not covered by this policy or PIPA.

"Work product information" means information prepared or collected by an individual or group of individuals as a part of the individual's or group's responsibilities or activities related to the individual's or group's employment or business but does not include personal information about an individual who did not prepare or collect the personal information.

"Employee personal information" means personal information about an individual that is collected, used or disclosed solely for the purposes reasonably required to establish, manage or terminate an employment relationship between the organization and that individual, but does not include personal information that is not about an individual's employment.

"Employment" includes working under an unpaid volunteer work relationship.

"Privacy Officer" means the individual designated responsibility for ensuring that White Rock Christian Academy complies with this policy and PIPA.

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1. Collection of Personal Information

- 1.1. Unless the purposes for collecting personal information are obvious and the employee or volunteer voluntarily provides his or her personal information for those purposes, White Rock Christian Academy will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2. White Rock Christian Academy will only collect employee and volunteer information that is necessary to fulfill the following purposes:
 - a. To establish, manage and/or terminate the employment relationship;
 - b. To recruit volunteers;
 - c. To establish and manage an effective volunteer program; and
 - d. To enable the authority to operate its administrative function, including payment of fees, operation of building security systems (including video and other surveillance systems), and maintenance of ancillary school programs such as parent voluntary groups and fundraising activities.

Examples of employee personal information collected by White Rock Christian Academy:

- Personal information provided by the individual during the hiring process, including information on résumés and application forms, criminal records check or teaching certificate verification check results, and/or information collected from references;
- Personal information in connection with the use of White Rock Christian Academy’s computer systems;
- Personal information collected in the course of the operation of building security systems, including video and other surveillance systems;
- Payroll and related information including, social insurance number, rate of pay, hours of work, deductions, bank account information, and any relevant court orders;
- Benefit information including social insurance number, premiums or contributions, coverage information, date of birth, marital status, dependent information, medical information; and
- Performance information, including work history, performance reviews, discipline and related notes and memorandums, documentation related to job qualifications (professional or technical qualifications), and internal competition information.

Examples of volunteer personal information collected by White Rock Christian Academy:

- Personal information provided by the individual during the recruiting process, including contact information, personal and professional history, criminal records check results, and/or information collected from references;
- Personal information collected in the course of the operation of building security systems, including video and other surveillance systems; and
- Information related to the volunteer’s services, including availability, schedule, duties, reviews, and related notes and memorandums and documentation related to volunteer qualifications (professional or technical qualifications).

2. Consent

- 2.1. White Rock Christian Academy will obtain employee and volunteer consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2. Consent can be provided verbally, electronically, or in writing, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the employee or volunteer voluntarily provides personal information for that purpose.
- 2.3. Consent may also be implied where an employee or volunteer is given notice and a reasonable opportunity to opt-out of his or her personal information being used and the employee or volunteer does not opt-out.

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- 2.4. On giving reasonable written notice to White Rock Christian Academy, and subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), an employees or volunteer may withdraw consent to the collection, use or disclosure of his or her personal information. Upon notice of withdrawal of consent, White Rock Christian Academy will notify the individual of the likely consequences of withdrawing his or her consent and, except where otherwise required or permitted by law, White Rock Christian Academy will stop collecting, using or disclosing the personal information as requested.
- 2.5. White Rock Christian Academy may collect, use or disclose personal information without an employee's or volunteer's knowledge or consent in the following circumstances (authorized by PIPA):
 - a. When the collection, use or disclosure of personal information is permitted or required by law;
 - b. In an emergency that threatens an individual's life, health, or personal security;
 - c. When the personal information is available from a public source;
 - d. When the personal information is collected by observation at a performance, a sports meet or a similar event (1) at which the individual voluntarily appears, and (2) that is open to the public;
 - e. When the collection is necessary to determine the individual's suitability (1) to receive an honour, award or similar benefit, including an honorary degree, scholarship or bursary, or (2) to be selected for an athletic or artistic purpose; and
 - f. When the personal information is necessary to facilitate (1) the collection of a debt owed to the organization, or (2) the payment of a debt owed by the organization.

3. Use and Disclosure of Personal Information

- 3.1. White Rock Christian Academy will only use or disclose personal information for the purpose for which it was collected (see *section 3.3.*) unless the individual has otherwise consented or when its use or disclosure is required or permitted by law.
- 3.2. White Rock Christian Academy will not sell, lease or trade information about employees and volunteers to other parties.
- 3.3. White Rock Christian Academy will only use or disclose employee and volunteer information that is necessary to fulfill the following purposes:
 - a. To establish, manage and/or terminate the employment relationship;
 - b. To recruit volunteers;
 - c. To establish and manage and effective volunteer program;
 - d. To enable the authority to operate its administrative function, including payment of fees, operation of building security systems (including video and other surveillance systems), and maintenance of ancillary school programs such as parent voluntary groups and fundraising activities; and
 - e. To provide personalized services such as staff photos and yearbooks.

Examples of third parties to which personal information about employees may be disclosed:

- Government departments, bodies and agencies such as Canada Customs and Revenue Agency, Workers Compensation Board, Ministry of Education,
- Payroll outsourcers;
- Financial institutions (for payroll related purposes), insurance companies, and benefit, group RRSP or pension plan administrators;
- Printing companies or yearbook publishers;
- The International Baccalaureate organization;
- Photography companies; and
- Database management organizations (e.g. ManageBac).

When White Rock Christian Academy discloses personal information to third-party service suppliers, these suppliers of specialized services are given only the information necessary to perform those services, and White Rock Christian Academy takes appropriate steps to ensure that such information

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is securely transferred and stored and is used only to fulfill the purposes for which it was disclosed to the service provider.

4. Retention of Personal Information

- 4.1. Personal information collected by White Rock Christian Academy 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.
- 4.2. If White Rock Christian Academy uses an employee's or a volunteer's personal information to make a decision that directly affects the employee or volunteer, we will retain that personal information for at least one year so that the employee or volunteer has a reasonable opportunity to request access to it.

5. Accuracy of Personal Information

- 5.1. White Rock Christian Academy will take appropriate steps to ensure that personal information collected by White Rock Christian Academy is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used or disclosed.
- 5.2. Employees and volunteers may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must provide sufficient detail to identify the personal information and the correction being sought.
- 5.3. White Rock Christian Academy 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.

6. Security of Personal Information

- 6.1. White Rock Christian Academy is committed to ensuring the security of employee and volunteer personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2. Employee and volunteer personal information will be secured with access within the school authority restricted to those individuals who, by the nature of their work, are required to have access to the information.
- 6.3. White Rock Christian Academy will protect personal information by security safeguards that are appropriate to the sensitivity level of the information such as:
 - Storage in locked filing cabinets;
 - Storage within a locked office;
 - Electronic storage on a server in a physically secure location;
 - Storage on a cloud server accessed through an encrypted connection (<https://>); and
 - An adequate back-up plan and recovery strategy for potential hardware failure and database corruption.
- 6.4. White Rock Christian Academy will use appropriate security measures when destroying employees' and volunteers' personal information such as shredding documents and deleting electronically stored information.
- 6.5. We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

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7. Access to Personal Information

- 7.1. Employees and volunteers may examine any personal information kept by the school authority pertaining to that individual unless the school authority is not permitted or not required - under PIPA or by a relevant court order - to provide access. Access will be granted upon written request with appropriate notice to the school administration. Access will be provided during school hours, while accompanied by the lead administrator or designate to interpret the records.
- 7.2. Upon request, an employee or volunteer may receive a copy of any record of personal information that he or she is entitled to examine. The school authority reserves the right to recover the direct cost of copying records.
- 7.3. Upon request, White Rock Christian Academy will also tell employees and volunteers how we use their personal information and to whom it has been disclosed, if applicable.
- 7.4. White Rock Christian Academy will make the requested information available within 30 business days, or provide written notice of an extension (up to 30 additional days) where additional time is required to fulfill the request. The written notice will include (1) the reason for the extension, (2) the time when a response from the organization can be expected, and (3) the rights of the applicant to lodge a complaint about the extension with the Privacy Commissioner.
- 7.5. If a request is refused in full or in part, White Rock Christian Academy will notify the employee or volunteer in writing, providing (1) the reasons for refusal, (2) the provision of PIPA on which the refusal is based, (3) the name, position title, business address and business telephone number of an officer or employee of the organization who can answer the applicant's questions about the refusal, and (4) the rights of the applicant to request a review of the decision from the Privacy Commissioner.

8. Questions and Complaints Regarding Personal Information

- 8.1. Employees and volunteers should direct any complaints, concerns or questions regarding White Rock Christian Academy's compliance with this policy and the *Personal Information Protection Act* in writing to the Privacy Officer of White Rock Christian Academy. If the Privacy Officer is unable to resolve the concern, the employee or volunteer may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for White Rock Christian Academy's Privacy Officer:

Mail: Attn: Privacy Officer
White Rock Christian Academy
2265 – 152nd St, Surrey, BC, V4A 4P1

Email: Attn: Privacy Officer
wrca@wrca.ca