



Preamble

As image bearers of God, we recognize that we are uniquely created with gifts and skills. Each person has a mandate to do their part in cultivating the earth and exercising dominion over it in a stewardly way. Our roles and responsibilities do define us to a certain degree. They contribute to who we are as persons. Whether we are students, employees, or volunteers, we should treat one another with respect. This respect includes how we collect and manage personal information of others.

Most activities of independent schools in Ontario that operate as charities are not subject to the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”); however, the privacy principles set out in Schedule 1 to *PIPEDA* serve as a framework for the collection, use, and disclosure of personal information of students, parents, and alumni. Quinte Region Christian Schools seeks to meet the highest standards possible and to comply, where possible, with applicable provisions relevant to public schools with respect to privacy legislation and any other applicable legislation. Other examples of privacy legislation which may apply include: the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), the Personal Health Information Protection Act (PHIPA) and the Education Act as it applies to the OSR guidelines.

This privacy policy applies to personal information of students, parents, staff, volunteers, and alumni of the school. This policy stands alongside the *Media Consent Policy*, the *Media Presence Policy*, *Acceptable Use of Technology Policy*, and the *Ontario Student Records Policy*.

“Personal Information”, as used in this Policy, means information about an identifiable student, parent of a student, or alumnus of the School.

Policy

Quinte Region Christian Schools (the “School”) values its relationship with its students, their parents, alumni, staff, and volunteers (collectively, “School Individual”) and is committed to the protection of their personal information.

The School applies the privacy principles set out in this Privacy Policy (the “Policy”) when collecting, using and disclosing personal information of a School Individual. The privacy principles that are the foundation of this Policy are based on the principles in Schedule 1 of the *Personal Information Protection and Electronic Documents Act (Canada)* (“PIPEDA”).

Principle 1 - Accountability

The Campus Principal has been assigned to oversee the implementation of this Policy at their campus. Accountability for compliance with this Policy rests with the Campus Principals, even though others within the School may have responsibility for the day-to-day collection and processing of personal information. For example:

- (a) the Administrative Assistant is assigned to updating the Ontario Student Records (OSRs) and parent and membership records.



- (b) the Bookkeeper is assigned to the payroll records, tuition files, and other financial information.

The School is responsible for personal information in its custody and under its control, including personal information that it has transferred to an external service provider for processing. Where the School uses external service providers that require access to personal information (e.g. to maintain its computer system or to assist with clerical or administrative activities), it requires the service providers to provide personal information protection at a comparable level to that provided by the School.

Principle 2 - Identifying Purposes

The School will identify and document the purposes for which it collects, uses, or discloses personal information at or before the time of collection. The purposes will be limited to those that are related to the School's business and activities including:

1. For Students, Parents, and Alumni

- to process applications and open and maintain a student file;
- to maintain a record of a student's course of study, evaluations, academic and other achievements;
- to process or facilitate scholarships, grants, and like awards;
- to provide information to other academic institutions (e.g. example colleges and universities);
- to communicate with students and parents about matters related to the student's attendance, evaluation, course of study, and School activities and events;
- to maintain contact with and notify alumni of activities, events, services, and other matters relating to the School;
- in connection with fundraising initiatives;
- for billing and processing of fees and donations;
- to communicate with designated contacts about and to manage emergencies;
- to obtain insurance and file insurance claims;
- in connection with a sale or other transaction or reorganization of the School's operations;
- to comply with legal requirements and cooperate with law enforcement activities.

2. For Staff & Volunteers

- to recruit, process applications, evaluate an applicant's suitability for employment or volunteer position, hire/retain individuals and monitor vacancies;
- to establish, maintain, and terminate records of the employment/volunteer relationship;
- to administer payroll, expenses, benefits, and provide services;
- to comply with statutory requirements including those related to taxation;
- to communicate or publicize information about School business, events, and services;
- to monitor and appraise performance;
- to provide development and training activities;
- to monitor time and attendance and leaves of absence;
- to administer health and safety requirements;



- to apply for grants, and in connection with other funding opportunities;
3. For All School Individuals
- to communicate with the individual's designated contact in an emergency;
 - to comply with legal requirements and cooperate with law enforcement activities;
 - to obtain insurance and file insurance claims;
 - in connection with a sale or like transaction or a reorganization of the School's operations.

If the School plans to use personal information it has collected for a purpose not previously identified, the School will identify the purpose and obtain consent to the use unless using the information without consent is permitted or required by law.

Principle 3 - Consent

The School only collects, uses, or discloses personal information with the knowledge and consent of the individual to whom it relates (or their parent or guardian), except where otherwise permitted or required by law.

The way in which the School seeks consent varies depending upon the sensitivity of the personal information, the reasonable expectations of the individual to whom it relates (and in the case of students, their parents) and the purpose for which the personal information is to be used.

Consent may be withdrawn, subject to legal restrictions and reasonable notice; however, the withdrawal (or refusal) of consent to use or disclose personal information may restrict or prevent participation in programs or the receipt of certain services. The School will provide notice where there will be implications to withdrawing consent.

The School will not, as a condition of employment or volunteering, require an employee or volunteer to consent to the collection, use, or disclosure of personal information beyond that required for those purposes.

The School may hire service providers to perform services on its behalf. The School provides them with a limited amount of information which is necessary in order for them to provide the services required. They are prohibited from using the information for purposes other than to facilitate and carry out the services they have been engaged to provide and are not permitted to disclose this information to others. The School will strive to protect personal information disclosed to third parties by contractual agreements requiring that those third parties adhere to confidentiality and security procedures and protections.

In some cases, personal information that the school manages may be transferred, processed and stored outside Canada, and therefore may be available to government authorities under lawful orders and laws applicable therein.

Principle 4 - Limiting Collection

The School will collect, use, and disclose personal information for the purposes identified above, for purposes identified outside of this Policy, or where otherwise permitted or required by law.



Principle 5 - Limiting Use, Disclosure and Retention

The School will not use or disclose personal information for purposes other than those for which it was collected, except with consent or as permitted or required by law.

The School retains personal information for as long as required to fulfill the identified purposes or to comply with statutory retention periods.

Personal information that has been used by the School to make a decision about an employee or volunteer will be retained for at least one year after the decision has been made.

The School destroys or makes anonymous personal information that it no longer needs for the identified purposes or legal requirements.

Principle 6 - Accuracy

The School will use its best efforts to ensure that personal information is as accurate and complete as is necessary for the purposes for which the information is to be used. The School asks students, parents, and alumni to update personal information they have provided to the School as it changes. It asks employees and volunteers to correct out-dated personal information, such as residential addresses and other contact information.

If an employee or volunteer demonstrates to the School that their personal information is inaccurate or incomplete, the School will correct or complete the Personal Information. Requests for correction should be made to the Campus Principal or designate (e.g. administrative assistant).

Principle 7 - Safeguards

To protect personal information against loss, theft, and unauthorized access, disclosure, use, and modification, the School has implemented safeguards such as:

- (a) physical measures, such as locked offices and other areas of the facilities;
- (b) organizational measures, such as permitting access on a “need to know” basis only, requiring external service providers that need access to personal information to use safeguards that provide a comparable level of protection to that provided to personal information by the School and enforcing such requirements; and
- (c) technological measures, such as the use of passwords to access the School’s computer system and security firewalls, etc.

The School requires compliance by its employees with this Policy, enforces that requirement, and exercises care in the disposal of personal information to prevent unauthorized access.

Principle 8 - Openness

Through this Policy, the School makes available a general account of its personal information management practices, including the purposes for which it uses and discloses personal information, instructions on how to gain access to and correct personal information and how to obtain additional information about the School’s privacy practices and/or its use and disclosure of particular personal information.



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Principle 9 - Access, Correction, Inquiries

Upon written request, the School will provide an individual with information about its use and disclosure of personal information (and, if applicable, their child's personal information), and except in limited circumstances, will give the individual access to personal information.

Except in limited circumstances, including where doing so would reveal personal information about another individual, the employee or volunteer will be permitted to review their own personal information in the presence of a designated employee of the School.

The School will correct or complete personal information, on the written request of an individual, where it is satisfied the information is inaccurate or incomplete.

Individuals are invited to direct any requests for access or correction and any questions they may have about this Policy, the School's privacy practices, or the School's management of their personal information to the Campus Principal (or designate).

The School will respond to written requests for correction or access as promptly as possible. The School may ask for additional information it needs to process a request and/or to verify identity and ensure that it does not disclose personal information to someone who is not authorized to receive it or otherwise in violation of this Policy.

Principle 10 - Compliance

As previously mentioned, any School individual is invited to bring any concerns or questions concerning the School's compliance with this Policy or personal information management to the relevant Campus Principal, who can be reached by contacting the school campus office.