

# PERSONAL INFORMATION PRIVACY POLICY

## PHIL & JENNIE GAGLARDI ACADEMY

### **Rational**

Safeguarding personal information of parents, students, employees, and volunteers is a fundamental concern of Gaglardi 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 describes the policies and practices of Gaglardi Academy regarding the collection, use and disclosure of personal information including the steps the school has taken to ensure personal and financial information is handled appropriately and securely.

### **Regulation: Ten Privacy Principles**

As part of Gaglardi Academy'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 Gaglardi Academy'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 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 Gaglardi Academy.

### **Principle 1 – Accountability**

Gaglardi Academy is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school has designated that the School Administrative Assistant is accountable for the school's compliance with the Ten Privacy Principles. Currently, Melissa Taylor is the Privacy Officer of the school. You may contact her as follows:

Gaglardi Academy

Attention: Jeff Bobyk, Privacy Officer

Address: 1475 Noel Avenue, Comox, B.C. V9M 3H8

Phone: (250) 339-1200

Cell" (604) 219-5633

Email: [communications@gaglardiacademy.ca](mailto:communications@gaglardiacademy.ca) Subject: Privacy Issue:

### **Roles & Responsibilities of The Privacy and Information Sharing Officer (PISO)**

The Privacy and Information Sharing Officer (PISO) will be appointed each school year. The role of the PISO includes but are not limited to the following responsibilities.

- Ensure personal and confidential information is protected.
- Ensure Google Drives and other electronic platforms are appropriately shared and protected.
- Manage and respond to **privacy** complaints or concerns.
- Identify organizational shortcomings and potential areas of non-compliance to the School's Comptroller.
- Support information sharing initiatives like Google Shared Drives.
- Advise Senior Team on privacy-related matters.

### **Principle 2 – Identifying Purposes**

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

#### **What Information is Collected?**

##### ***Parent/Guardian & Student:***

Gaglardi Academy 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 come to the school directly from parents and students or is information regarding the student's school activities, performance or behaviour, such as attendance records and 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. Gaglardi Academy also collects information in connection with the use of its computer systems. Personal information may also be collected and used and disclosed in the course of the operation of building security systems, including video and other surveillance systems.

### **Volunteers:**

Gaglardi Academy collects, uses and discloses personal information about volunteers for the purposes of recruiting volunteers and establishing and managing an effective volunteer program and for other purposes identified when the information is collected. Set out below are some examples of personal information about volunteers collected, used and disclosed by Gaglardi Academy.

- information collected, used and disclosed in the recruiting process including information on resumes and application forms (contact information, personal and professional history, qualifications) and information collected from any references;
- 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);
- Personal information about volunteers (including photographs and biographical information) may also be collected, used and disclosed in the course of the school's activities including in publications such as yearbooks and newsletters, and websites.
- Personal information about and volunteers may be collected and used and disclosed in the course of the operation of building security systems, including video and other surveillance systems.

### **Employees:**

Gaglardi Academy collects, uses and discloses personal information about employees in order to establish, manage and terminate the employment relationship and for other purposes identified when the information is collected.

Set out below are some examples of personal information about employees collected, used and disclosed by Gaglardi Academy in its operations.

- personal information collected, used and disclosed in the hiring process, including information on resumes and application forms (contact information, personal and professional history, qualifications, emergency contact information) results of criminal records checks, information collected from references;
- payroll and related information including, social insurance number, rate of pay, hours of work, deductions, bank account information, any court orders;

- benefit information including social insurance number, premiums or contributions, coverage information, date of birth, marital status, dependent information, medical information;
- performance information, including work history, performance reviews and evaluations, discipline and related notes and memorandums, documentation related to job qualifications (professional or technical qualifications), internal competition information;
- other personal information as required or permitted by law.

### **Principle 3 – Consent**

Gaglardi Academy 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, Gaglardi Academy will take into account both the sensitivity of the personal information and the purposes for which Gaglardi Academy will use the information. Consent may be express, implied (including through use of “opt-out” consent where appropriate), or deemed.

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

If a person provides Gaglardi Academy 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 Gaglardi Academy to collect, use and disclose such personal information for the purposes set forth in this Personal Information Privacy Policy.

From time to time, Gaglardi Academy may advise its stakeholders (Parents, Guardians, Volunteers, and Employees) other purposes for which it will collect, used or disclose personal information, in which case the school will, if appropriate, obtain consent for collection, use or disclosure of that personal information.

#### **Principle 4 – Limiting Collection**

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

#### **Principle 5 – Use, Disclosure and Retention**

Gaglardi Academy 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.

#### **How is Information Used?**

Gaglardi Academy uses personal information as follows:

##### ***Parent/Guardian & Student:***

- 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 fund-raising.
- health, psychological, or legal information to provide certain specialized services in those areas or as adjunct information in delivering educational services.

##### ***Employee & Volunteers***

- Personal information about employees and volunteers is used for the purposes identified under Principle 2.

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. Gaglardi Academy may use anonymous information, such as information collected through surveys or statistical information regarding students, to constantly improve our school.

#### **When May Information be Disclosed?**

Gaglardi Academy may disclose 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 Gaglardi Academy may disclose personal information.

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 Authorized by You

#### **Parents, Guardians & Student:**

- 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, PAC, parent meetings, fund-raising, events, etc.

#### **Employee & Volunteers**

Personal information about employees is disclosed to third parties for purposes related to the employment relationship, including to

- 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, benefit, group RRSP and pension plan administrators for enrolment in and administration of benefits, plans and claims<sup>1</sup>
- teacher certification information pas per form I2001 filed with the Ministry of Education;
- advisors to Gaglardi Academy such as accountants or lawyers;
- when required by law.

Personal information about volunteers may be disclosed for the purposes of establishing and managing an effective volunteer program and for other purposes identified when the information is collected. Information may also be disclosed when required by law.

### When Required by Law – Parents, Guardians, Employees and Volunteers

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. Only the information specifically requested is disclosed and the school takes precautions to ensure that the authorities making the request have legitimate grounds to do so.

### When Permitted by Law - Parents, Guardians, Employees and Volunteers

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 - Parents, Guardians, Employees and Volunteers

At Gaglardi Academy, the school sometimes contacts outside organizations to perform specialized services such as printing, student assessments, market research, fundraising research or data processing.

Suppliers of specialized services are given only the information necessary to perform those services, and Gaglardi Academy 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- Parents, Guardians, Employees and Volunteers

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.

### How Long Is Personal Information Retained? - Parents, Guardians, Employees and Volunteers

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.

## **Principle 6 – Accuracy - Parents, Guardians, Employees and Volunteers**

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

### **How May I Update Outdated or Incorrect Information?**

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

## **Principle 7 – Safeguarding Personal Information - Parents, Guardians, Employees and Volunteers**

Gaglardi Academy will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

### *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.

### *Student Files*

Student files are stored in a fire-proof, 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.

### *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 - Parents, Guardians, Employees and Volunteers**

Gaglardi Academy will make information available to constituents concerning the policies and practices that apply to the management of personal information. Individuals may direct any questions or inquiries with respect to the school's privacy policies or practices to the Privacy Officer of Gaglardi Academy.

## **Principle 9 – Individual Access - Parents, Guardians, Employees and Volunteers**



Gaglardi Academy 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.

#### *How May I Access My Personal Information?*

Parties may access and verify any personal information with appropriate notice so that the office is able to supply the information required.

#### *Parent Access to Student Personal Information*

A parent 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.

#### **Principle 10 – Complaint Process - Parents, Guardians, Employees and Volunteers**

Parties 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 Director at [director@gaglardiacademy.ca](mailto:director@gaglardiacademy.ca). If necessary, constituents will be referred to use the school's complaint procedure and appeals policies.

*Source: FISA's Personal Information Privacy Policy for parents and students (2012),  
Updated November 26, 2019  
Updated November 18, 2021  
Updated September 18, 2023  
Updated November 14, 2023*