



1. Purpose: to outline the procedures and protocols for protection of personal information in accordance with the requirements of the [Personal Information Protection Act \(PIPA\)](#)

2. Persons/Area Affected: students, employees

3. Definitions:

“**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 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 Kamloops Christian School.

4. Responsibilities:

The KCS Privacy and Information Sharing Officer has the authority to intervene on any matters related to personal information protection. A privacy officer is responsible for:

- Conducting a privacy audit and self-assessment
- Developing a privacy policy
- Implementing and maintaining a privacy policy
- Managing privacy training
- Responding to requests for access to and correction of personal information
- Working with the Information and Privacy Commissioner in the event of an investigation

A Privacy and Information Sharing Officer must also be familiar with the [Personal Information Protection Act](#) and the [ten principles of privacy protection](#).

The Privacy and Information Sharing Officer is responsible for ensuring that KCS staff receive annual training in reviewing this policy and understanding how to protect personal information.

The position of Privacy and Information Sharing Officer will be fulfilled by the Principal & Head of School.

5. Procedures

5.1. Purpose for collecting information:

KCS must identify the purpose for which personal information is being collected, used, and disclosed. KCS will only collect personal information that is necessary for the purposes identified by the school. This includes (but is not limited to):

- 5.1.1. New Family Application for Enrollment
 - 5.1.2. Re-registration
 - 5.1.3. Athletic forms (including forms completed for participation in SD73 Extracurricular Sports)
 - 5.1.4. Request for administration of medication at school
 - 5.1.5. Report cards, Individual Education Plans, Learning Support Plans, etc.
 - 5.1.6. Tuition invoices and other payments for school programs
 - 5.1.7. Fundraising activities
 - 5.1.8. Parent Action Committee membership
 - 5.1.9. Kamloops Christian School Association membership
 - 5.1.10. MyEducationBC (province-wide student information system)
 - 5.1.11. Student information required by the Ministry of Education and ChildCare for operational grants and special education grants
 - 5.1.12. Google Suite (includes Gmail, Google Documents, Google Slides, Google Forms, etc.)
 - 5.1.13. Educational sites
 - 5.1.13.1. Educational sites used by the school that require a student's personal information (school email account or student name) will be identified on the KCS website with a link to the privacy impact assessment for that site.
 - 5.1.13.2. Parents/guardians can request a student not to use an educational site by contacting the Privacy Officer (Principal & Head of School).
 - 5.1.13.3. Parent/guardian consent for student use of educational sites is included in the New Family Application for enrollment form and in the annual Re-registration form.
- 5.2. Obtaining consent for collecting information:
KCS must obtain consent from parents 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. Written parent/guardian consent will be obtained for:
- 5.2.1. Transferring Permanent Student Records to a different school
 - 5.2.2. Sharing specified information about a student with a professional not employed by KCS
 - 5.2.3. Sharing specified information with a family member who is not a parent/guardian (ie. grandparent)
 - 5.2.4. Collecting information on behalf of SD73 in order to participate in extra-curricular sports. This information will be retained by the school unless SD73 requests a copy of the information and a parent/guardian consents to sharing the information.
 - 5.2.5. Per [Students Records Order Section 6\(1\)](#), KCS will not obtain parent/guardian consent for the sharing of information regarding an enrolled student for the delivery of health services, social services, or other support services. Parental consent is not required when record disclosure is required by legislation.
 - 5.2.6. KCS is legally permitted to disclose some personal information without consent 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 to the authorities who require the information requested.
 - 5.2.7. KCS will not sell, lease or trade information about you to other parties.

- 5.3. Use and retention of personal information:
 - 5.3.1. KCS will take responsible steps to ensure that personal information is securely transferred and stored and is used only to fulfill the purposes for which it was disclosed to the service provider.
 - 5.3.2. KCS will not retain personal information related to students or families unless required by law (i.e. retaining Permanent Student Records). Personal information related to students or families who are no longer enrolled at KCS will be destroyed securely.
 - 5.3.3. KCS employees (continuing, casual, or contract) must sign confidentiality agreements that include maintaining privacy and ensuring protection of personal information.
 - 5.3.4. KCS employees will receive training on the protocols for protecting personal information, retaining personal information, and securely destroying personal information.
 - 5.3.5. The school manages electronic files appropriately with passwords and security measures that limit access by unauthorized personnel. The school's security practices are reviewed regularly to ensure that the privacy of personal information is not compromised.

- 5.4. Requesting changes to personal information:
 - 5.4.1. Families will be asked to update personal information once a year when re-registering their child(ren) for enrollment in the following school year.
 - 5.4.2. Families will be reminded to update personal information throughout the year by contacting the main office or finance department.
 - 5.4.3. Families can request changes to any personal information held by the school, if that information is incorrect, by sending the request in writing to the main office.

- 5.5. Transparency and access to personal information
 - 5.5.1. This policy will be posted on the school's website and on the KCS app for families' reference.
 - 5.5.2. Any questions or concerns about protection of personal information should be directed to the Privacy Office (the Principal & Head of School).
 - 5.5.3. Individuals may access and verify any personal information with appropriate notice so that the office is able to supply the information required.
 - 5.5.4. A parent/guardian may access and verify school records of the student, with appropriate notice, during regular school hours in the presence of the Privacy Officer unless a court order prohibits access to school records.

- 5.6. Concerns regarding personal information protection
 - 5.6.1. 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.
 - 5.6.2. If necessary, individuals will be referred to use the school's appeals policy to resolve the concern.