

## POLICY AND PROCEDURES

<b>POLICY NAME:</b> Personal Information and Protection of Privacy for Students	<b>POLICY NUMBER:</b> 1.2.1	<b>CATEGORY:</b> Administration and Operations
<b>RESPONSIBLE EXECUTIVE:</b> President	<b>APPROVAL AUTHORITY:</b> Senior Leadership Team	<b>EFFECTIVE DATE:</b> September 4, 2020
<b>NEXT FULL REVIEW DATE:</b> September 3, 2025 or amendments from PIPA	<b>REVISED:</b> November 7, 2023	<b>REPLACES:</b>

### **Purpose**

This policy establishes the guidelines and practices for the collection, use, disclosure and safeguarding of personal information obtained by Coquitlam College (the College).

### **Scope**

This policy applies to all students, parents, staff, agents of, or associated with, the College.

This policy is guided by the privacy standards established by British Columbia's *Personal Information Protection Act* (PIPA) and any other applicable privacy legislation.

### **Policy Statements**

1. The College is committed to meeting or exceeding the privacy standards established by British Columbia's *Personal Information Protection Act* (PIPA) and any other applicable legislation.
2. As part of the College's commitment, the *Ten Privacy Principles* govern the actions of the school as they relate to the use of personal information.

## **PROCEDURES**

### **Principle 1: Accountability**

1. The College is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school designates (an) individual(s) who is(are) accountable for the school's compliance with the *Ten Privacy Principles*. This individual is the *Privacy Officer* of the school. The Privacy Officer of the College is the President.

### **Principle 2: Identifying Purposes**

2. The College 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?**

3. The College 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, students and agents or is information regarding the student's school activities, performance or behaviour, such as attendance records or 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. The College also collects information in connection with the use of its computer systems.

### **Principle 3: Consent**

4. The College 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.
5. 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, the College will take into account both the sensitivity of the personal information and the purposes for which the College will use the information. Consent may be express, implied (including through use of “opt-out” consent where appropriate) or deemed. For example, if an individual provides his/her mailing address and requests information regarding a particular service, consent to use the address to provide the requested information may be implied.
6. On giving reasonable written notice to the College, an individual may withdraw consent to the collection, use or disclosure of his or her personal information. Upon notice of withdrawal of consent, the College will notify the individual of the likely consequences of withdrawing his or her consent and, except where otherwise required or permitted by law, the College will stop collecting, using or disclosing the personal information as requested.
7. If a person provides the College 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 the College to collect, use and disclose such personal information for the purposes set forth in this Personal Information Privacy Policy.

### **Principle 4: Limiting Collection**

8. The College will limit the personal information collected to that information necessary for the purposes identified by the school.

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

9. The College 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?

10. The College uses personal information as follows:
  - 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 fundraising.
  - health, psychological, or legal information to provide certain specialized services in those areas or as adjunct information in delivering educational services.

## POLICY AND PROCEDURES

11. 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.
12. The College 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?

13. The College may disclose an individual's 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 the College may disclose personal information.

### When Authorized by You

14. 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.
15. 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, participation groups, parent meetings, fundraising, events, annual general meetings, etc.
16. 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 Required by Law

17. 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. Student information as per Form 1701 is annually filed with the Ministry of Education.
18. The College may share student information for the delivery of health services, social services, or other support services to professional health providers without the permission of the parents/guardians.
19. Only the information specifically requested is disclosed and the school takes precautions to satisfy itself that the authorities making the request have legitimate grounds to do so.

### When Permitted by Law

20. 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.
21. The school does not sell, lease, or trade information about you to other parties.

### Outside Service Suppliers

22. The College sometimes contacts outside organizations to perform specialized services such as printing, student assessments, market research or data processing. Suppliers of specialized services are given only the information necessary to perform those services, and the College

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

23. 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?

24. 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**

25. The College will take appropriate steps to ensure that personal information collected by the College 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?

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

27. The College will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

### The School's Employees

28. In the course of daily operations, access to personal information is restricted to authorized employees who have a legitimate reason for accessing it. For example, teachers will have access to personal information about students but not your account with the school.
29. 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

30. Student files are stored in 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

31. 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**

32. The College will make information available to individuals concerning the policies and practices that apply to the management of personal information.
33. Individuals may direct any questions or enquiries with respect to the school's privacy policies or practices to the Privacy Officer of the College.

### **Principle 9: Individual Access**

34. The College 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?

35. Individuals may access and verify any personal information with appropriate notice so that the office is able to supply the information required. Most of this information is available in the registration forms and other forms that you filled out.

#### Parent Access to Student Personal Information

36. A parent may access and verify school records of the student who is under the age of 19 years, 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.

#### Student Access to Student Personal Information

37. Please refer to the Student Records Requirements and Best Practice Guidelines for Independent Schools in the Coquitlam College Policy and Procedure Manual.

### **Principle 10: Complaint Process**

38. Individuals may question compliance with the above principles.

### **Questions, Concerns and Complaints**

39. 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. If necessary, individuals will be referred to use the school's complaint procedure and appeals policies.

### **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 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 at the College.

### **Related Documents**

- [Personal Information Protection Act \(PIPA\)](#)

- [FISA Guidelines](#)