



CATHOLIC INDEPENDENT SCHOOLS OF KAMLOOPS DIOCESE

ADMINISTRATION PERSONAL INFORMATION PROTECTION ACT (PIPA) FOR EMPLOYEES AND VOLUNTEERS - 310

Rationale

In an era of electronic and virtually instantaneous transmission of information and data, appropriate safeguards on the personal privacy of personnel and volunteers is not only necessary but mandated by law.

Policy

The **Catholic Independent Schools, Kamloops Diocese** (CISKD) 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 CISKD regarding the collection, use and disclosure of personal information about employees and volunteers, including the steps the **Catholic Independent Schools, Kamloops Diocese** has taken to ensure personal and financial information is handled appropriately and securely.

CISKD may add, modify or remove portions of this Personal Information Privacy Policy when it is considered appropriate to do so, and any such changes will be effective upon giving notice of the revised policy. The most recent update of this Personal Information Privacy Policy can be found in the Policies and Procedures Manual of CISKD or is available from administration. This Personal Information Privacy Policy may be supplemented or modified from time to time.

Procedure

Ten Privacy Principles

As part of **Catholic Independent Schools, Kamloops Diocese** commitment, the *Ten Privacy Principles* govern the actions of CISKD as they relate to the use of personal information. This Personal Information Privacy Policy describes the *Ten Privacy Principles* and provides further details regarding **Catholic Independent Schools, Kamloops Diocese's** compliance with the principles.

Definition

In this Personal Information Privacy Policy, the following term has the meaning 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.

Principle 1 - Accountability

Catholic Independent Schools, Kamloops Diocese is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the CISKD



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designates (an) individual(s) who is (are) accountable for each of the school's compliance with the *Ten Privacy Principles*. This individual is the *Privacy Officer* of the school.

You may contact our Privacy Officer as follows:

1. Catholic Independent Schools Kamloops Diocese (CISKD)
Superintendent of Schools
2. ASCEND Online, Kamloops - Principal
3. Our Lady of Perpetual, Kamloops - Principal
4. Sacred Heart, Williams Lake - Principal
5. St. Ann's Academy, Kamloops - Principal
6. St. Ann's Catholic, Quesnel - Principal
7. St. James Catholic, Vernon - Principal

Principle 2 - Identifying Purposes

What Information is Collected, Used and Disclosed?

Employees

Catholic Independent Schools, Kamloops Diocese 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 **Catholic Independent Schools, Kamloops Diocese**

- a. 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.
- b. Payroll and related information including, social insurance number, rate of pay, hours of work, deductions, bank account information, any court orders.
- c. Benefit information including social insurance number, premiums or contributions, coverage information, date of birth, marital status, dependent information, medical information.
- d. Performance information, including work history, performance reviews, discipline and related notes and memorandums, documentation related to job qualifications (professional or technical qualifications), internal competition information.
- e. Personal information about personnel (including photographs and biological information) may also be collected, used and disclosed in the course of the school's activities including publications such as yearbooks, newsletters, and websites.
- f. Computer use and email are monitored in accordance with the Acceptable Use of Technology Policy 413 and personal information collected in the operation and maintenance of these systems.
- g. Personal information about personnel may be collected, used and disclosed in the course of the operation of building security systems, including video and other surveillance systems.
- h. other personal information as required or permitted by law.

Volunteers



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Catholic Independent Schools, Kamloops Diocese 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 **Catholic Independent Schools, Kamloops Diocese**

- a. Personal 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;
- b. 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);
- c. Personal information about employees and 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.
- d. Computer use and e-mail are monitored in accordance with the CISKD Acceptable Use of Technology Policy 413 as applicable, and personal information is collected in the operation and maintenance of these systems.
- e. Personal information about employees 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.

Principle 3 - Consent

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 **Catholic Independent Schools, Kamloops Diocese** will take into account both the sensitivity of the personal information and the purposes for which **Catholic Independent Schools, Kamloops Diocese** will use the information. Consent may be express, implied (including through use of "opt-out" consent where appropriate) or deemed.

Most personal information is collected, used, and disclosed for the purposes of establishing, managing, and terminating the employment or volunteer relationship. In most cases, consent is not required. In other cases, consent will be sought or implied where it is reasonable to do so. From time to time, **Catholic Independent Schools, Kamloops Diocese** may advise employees and volunteers of other purposes for which it will collect, use, 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

Catholic Independent Schools, Kamloops Diocese will limit the personal information collected to that information necessary for the purposes identified by the school.

Principle 5 - Use, Disclosure and Retention



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Catholic Independent Schools, Kamloops Diocese 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?

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 notify the employee or volunteer of that purpose.

Catholic Independent Schools, Kamloops Diocese may use anonymous information, such as information collected through surveys or statistical information about employees and volunteers to improve the school's operations.

When May Information be Disclosed?

Catholic Independent Schools, Kamloops Diocese 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.

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.
- Teacher certification information as per form I-2001 filed with the Ministry of Education.
- Advisors to **Catholic Independent Schools, Kamloops Diocese** including accountants, lawyers, and consultants.
- **Schools of Catholic Independent Schools, Kamloops Diocese** as reasonably required by the operations of **Catholic Independent Schools, Kamloops Diocese**, and the **schools**.
- When required or permitted 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 or permitted by law.

CISKD does not sell, lease, or trade information about employees and volunteers to other parties.

Outside Service Suppliers

At Catholic Independent Schools, Kamloops Diocese, the School sometimes contacts outside organizations to perform specialized services such as printing, payroll services, market research or data processing. For example, schools often give the yearbook publisher the information required to produce the annual yearbook. Suppliers of specialized services are given only the information necessary to perform those services, and **Catholic Independent Schools, Kamloops Diocese** 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.



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Restricting Sharing Information

If an individual wishes to limit the sharing of personal information as permitted by law, the individual must submit to the Privacy Officer a written letter specifying which items of personal information are to be limited and to whom these items are to be restricted. The Privacy Officer will advise the individual whether the requested information can be restricted in the manner requested.

How Long Is Personal Information Retained?

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

Catholic Independent Schools, Kamloops Diocese will take appropriate steps to ensure that personal information collected by each of the **Catholic Independent Schools, Kamloops Diocese** is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used, or disclosed. Employees and volunteers are responsible for providing up-to-date personal information to the school or CISKD as required.

How May I Update Out-dated or Incorrect Information?

An individual may, upon written request to the appropriate Privacy Officer request that **Catholic Independent Schools, Kamloops Diocese** correct an error or omission in any personal information that is under **Catholic Independent Schools, Kamloops Diocese** control and **Catholic Independent Schools, Kamloops Diocese** 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

Catholic Independent Schools, Kamloops Diocese will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

Employees and volunteers will be appropriately educated about the importance of privacy, and they are required to follow the school's policies and procedures regarding handling of personal information.

An employee's failure to abide by school policies may result in discipline, up to and including termination of employment. A volunteer's failure to do so may result in termination of the volunteer relationship.

Employee Files

Employee files are stored in secured filing cabinets. Access to personal information is restricted to authorized employees who have a legitimate reason for accessing it.

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.



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Principle 8 - Openness

Catholic Independent Schools, Kamloops Diocese will make information available to individuals concerning the policies and practices that apply to the management of personal information.

Individuals may direct any questions or enquiries with respect to the school's privacy policies or practices to the Privacy Officer.

Principle 9 - Individual Access

The Privacy Officer 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?

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

Principle 10 - Complaint Process

Individuals may question compliance with the above principles.

Questions, Concerns and Complaints

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.

REFERENCE

FISA BC Policy Aide for PIPA

[PIPA](#)

[Independent School Act \[RSBC 1996\] Chapter 216](#)

[Independent School Regulation Student Records Order:](#)

[Child, Family and Community Service Act](#)

Date Approved: April 2011
Date(s) Revised: October 2020, April 2023, June 2023