



## **SELKIRK MONTESSORI SCHOOL PERSONAL INFORMATION PRIVACY POLICY AND PRINCIPLES**

### Preamble

Safeguarding personal information of parents and students is a fundamental concern of Selkirk Montessori School. Selkirk 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 Selkirk Montessori School regarding the collection, use and disclosure of personal information about parents and students including steps that Selkirk has taken to ensure personal and financial information is handled appropriately and securely. As well, this policy puts into writing the privacy practices to which we have adhered during the past several years.

Selkirk Montessori School 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 approval by the Pacific Montessori Society Board of Directors. This Personal Information Privacy Policy may also be supplemented or modified by agreements entered into between Selkirk Montessori School and an individual(s) from time to time.

### Ten Privacy Principles

As part of Selkirk Montessori School's commitment, the Ten Privacy Principles govern the actions of Selkirk as they relate to the use of personal information. This Personal Information Privacy Policy describes the Ten Privacy Principles and provides further details regarding Selkirk Montessori School'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 Selkirk Montessori School.

### Principle 1 – Accountability

Selkirk Montessori School is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the School designated (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.

You may contact our Privacy Officer as follows:

Selkirk Montessori School

Attention: Privacy Officer

2970 Jutland Road

Victoria, BC V8T 5K2

Telephone: 250-384-3414

Facsimile: 250-384-3449

Email: [office@selkirkmontessori.ca](mailto:office@selkirkmontessori.ca)

### Principle 2 – Identifying Purposes

Selkirk Montessori School intends to identify the purposes for which the information is collected, used and disclosed before or at the time personal information is collected.

Selkirk Montessori School collects and uses personal information to provide students with the best possible educational services and to take appropriate measures to ensure the safety of its students. Most of the information that Selkirk collects comes to Selkirk directly from parents and students, grandparents of the students, 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 Selkirk, then Selkirk will ask you to provide the information that enables completion of 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. Selkirk Montessori School may also collect 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.

### Principle 3 – Consent

Selkirk Montessori School 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, Selkirk Montessori School will take into account both the sensitivity of the personal information and the purposes for which Selkirk Montessori School 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 is implied.

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

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

#### Principle 4 – Limiting Collection

Selkirk Montessori School will limit the personal information collected to that information necessary for the purposes identified by the school.

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

Selkirk Montessori School 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.

Selkirk Montessori School uses personal information as follows:

- To communicate with parents, students, and grandparents who are responsible for payment of student tuition fees or who are otherwise authorized by parents to receive communications;
- To process applications and ultimately to provide students with the educational services and co-curricular programs expected;
- To ensure that only authorized persons pick up a student from school and to contact authorized persons in case of emergency or illness;
- To enable Selkirk to operate its administrative function, including payment of school fees, applications for funding to the Ministry of Education, and maintenance of non-educational school programs including parent, grandparent, 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; and,
- To communicate with parents (past and present), students (past and present), grandparents who are responsible for payment of student tuition fees or who are otherwise authorized by parents to receive communications (past and present) and friends of Selkirk Montessori School, for the purposes of advising of activities and events in the promotion of the school including fund raising and other initiatives.

If for any reason personal information is required to fulfill another purpose, Selkirk will, where appropriate, request consent before proceeding. Selkirk Montessori School may use anonymous information, such as information collected through surveys or statistical information regarding students, to improve our school.

Selkirk Montessori School 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.

Selkirk Montessori School may disclose personal information when authorized, when required by law, when permitted by law, and to outside service suppliers.

### **When Authorized**

#### Examples:

- Other educational institutions routinely contact Selkirk for personal information about students. For example, if a student moves to another school, 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 Selkirk to provide para-educational and administrative services that may be operated by Selkirk. These services include phoning committees, participation groups, parent meetings, fundraising, events, annual general meetings, etc.

In some cases, when communication is over the telephone, consent to the use and/or disclosure of information will be obtained verbally. In other cases, such as when communicating electronically, consent will be obtained in written email.

### **When Required by Law**

The type of information that Selkirk is legally required to disclose most often relates to family court issues, legal proceedings, court orders and government tax reporting requirements. Certain student information is required to be filed with the Ministry of Education.

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

## **When Permitted by Law**

Selkirk is legally permitted to disclose some personal information in situations such as a legally authorized investigation, reasonable methods to collect overdue accounts, a medical emergency or suspicion of illegal activities, etc. Only pertinent information is disclosed.

## **Outside Service Suppliers**

Selkirk Montessori School may contact outside organizations to perform specialized services such as printing, student assessments, market research or data processing. For example, Selkirk gives its 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 Selkirk Montessori School 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.

Selkirk does not sell, lease or trade information about you to other parties.

## **Restricting the Sharing of Information**

The sharing of personal information may be restricted by contacting Selkirk's office and submitting in writing which specific items of personal information are to be limited, and to whom these items are to be restricted. Certain agencies, by law, have access to certain types of personal information.

## **Retention of Personal Information**

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**

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

## **Updating Outdated or Incorrect Information**

An individual may, in writing, request that Selkirk Montessori School correct an error or omission in any personal information that is under Selkirk Montessori School's control. Selkirk Montessori School will, as appropriate, amend the information as requested.

## Principle 7 – Safeguarding Personal Information

Selkirk Montessori School will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

### **Employees of Selkirk Montessori School**

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 Selkirk.

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 securely. 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**

Selkirk manages electronic files appropriately with security measures that limit access by unauthorized personnel. Selkirk's security practices are reviewed periodically to ensure that the privacy of personal information is not compromised.

## Principle 8 – Openness

Selkirk Montessori School will make available, to persons so entitled, information regarding 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 of Selkirk Montessori School.

## Principle 9 – Individual Access

Selkirk Montessori School will inform an individual, upon the individual's written 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.

Individuals may access and verify any personal information with appropriate written notice delivered to the Privacy Officer at Selkirk Montessori School. Most of this information is available in the registration forms and other forms submitted by you to Selkirk.

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

A parent may access and verify school records of the student, with appropriate written notice during normal school hours. In situations of family breakdown, the school will grant access to records of students in accordance with the law.

### **Exceptions to Access of Record**

Selkirk Montessori School may exercise its right to deny access to some information contained in student files where the disclosure of information may threaten someone else's safety, mental or physical health, or where disclosure could be harmful to personal privacy of a third party (please reference section 19 and 22 of the Personal Information Privacy Act).

In considering disclosure exception, Selkirk will take into consideration the following.

- Relevant Circumstances
  - Was the information supplied in confidence?
  - Will disclosure unfairly damage reputation?
  - Is the personal information relevant to fair determination of the applicant's rights?
- Disclosure Presumed to be Unreasonable Invasion of Third Party's Personal Privacy
  - Does the personal information relate to educational history?
  - Does the personal information consist of personal recommendations or evaluations about the third party?
  - Does the personal information relate to medical, psychiatric or psychological history, diagnosis, condition, treatment or evaluation?
- Examples of denying access to information would include,
  - Evaluations supplied in confidence by a teacher about student with the mutual understanding that the evaluation will be confidential.
  - Disclosure of teacher/student interview notes to the student's parent on the basis that mental or physical health may be jeopardized. This could also invade the student's personal privacy.

## 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 by calling or writing the school office. If necessary, individuals will be referred to follow the school's complaint procedure and appeals policy.

Revised version approved August 2005 and confirmed September 21, 2005.