



**RICHMOND
CHRISTIAN
SCHOOL**

EST. 1957

POLICY NUMBER AND NAME: 08.26 PERSONAL INFORMATION AND PRIVACY POLICY FOR EMPLOYEES AND VOLUNTEERS – VERSION 1.0	RESPONSIBILITY	BOARD	SUPERINTENDENT	SLT
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SECTION: 08 – EMPLOYEES AND ORGANIZATION	LAST REVISION DATE:			
ADOPTED: SEPTEMBER 28, 2026	REVIEW FREQUENCY: EVERY 3 YEARS			

PREAMBLE

The School is committed to ensuring the protection and security of all Personal Information within its control. The School recognizes the importance of privacy in relation to personal information it receives and maintains about employees, volunteers, and contracted service providers (“**Staff**”). The School is subject to comply with the *BC Personal Information Protection Act* (“**PIPA**”). And the School believes it is important to make every effort to ensure the accuracy, privacy, confidentiality, and security of such information in accordance with the PIPA. This Policy describes the principles the School will apply when protecting Staff personal information.

The administration of this Policy is the responsibility of the School Principal (or state otherwise). All school employees, contractors, and volunteers (“**Staff**”) will follow the School’s procedures for collecting, using, maintaining, and protecting Staff personal information.

SCOPE

This policy applies to all employees, contractors, and volunteers of the School (“**Staff**”). All Staff are to recognize the importance of privacy in relation to personal information the School receives and maintains about employees, volunteers, and contracted service providers.

REVIEW HISTORY		
DATE	VERSION	CHANGES

1. DEFINITIONS:

- a. ***Personal Information*** - refers to any information about an identifiable individual that is collected, used, disclosed, or processed by the School in connection with the School's services, operations, or administration, but it does not include Staff contact information or work product information.
- b. ***Privacy Officer*** - is the first point of contact in an organization when privacy issues arise. The person has the authority to intervene on privacy issues relating to any of your organization's operations.
- c. ***Privacy Breach*** - means the theft or loss of or the collection, use, or disclosure of Personal Information not authorized by the BC Personal Information Protection Act (PIPA) and includes cyber and ransomware attacks and other situations where there are reasonable grounds to believe that any such unauthorized activities have taken place or there is a reasonable belief that they will take place.
- d. ***Staff*** - For this purpose of this policy, "Staff" refers to employees, volunteers, contracted service providers and persons authorized to access student records when planning for, or delivering, health services, social services or other support services to a student of the School.

2. PROCEDURES:

The Privacy Officer appointed by the Authority/Board is the Principal (or designated appointee).

- a. ***The School's Accountability for Personal Information and Privacy***
 - i. Maintaining the privacy and security of personal information is important to the School. The Staff are accountable for the protection of the personal information within the School's control, and the School will have a Privacy Officer who is responsible for implementing the School's privacy management program and ensuring it complies with the PIPA and other applicable privacy laws.
 - ii. Staff who have questions about how the School uses, processes, manages, and protects personal information may contact the School's Privacy Officer. The Privacy Officer can be reached at the School via the School's phone number (____-____-____) or email address (____@____.____).
- b. ***The Privacy Officer***

The School's Privacy Officer is responsible for:

 - i. conducting a privacy audits and self-assessments;
 - ii. developing the School's Privacy Policy/ies;
 - iii. implementing and maintaining the Privacy Policy/ies;

- iv. managing privacy training;
- v. responding to requests for access to and correction of personal information; and
- vi. working with the BC Privacy Commissioner in the event of an investigation.

The Privacy Officer shall be familiar with the Personal Information Protection Act and the ten principles of privacy protection.

c. *The Basis/Purpose for Which the School Collects Personal Information*

- i. The School is permitted to collect, use, and disclose personal information about staff where reasonably required in order to establish, manage, or end the employment/contract/volunteer relationship and for other purposes that are permitted under applicable laws.
- ii. If the School seeks to use staff personal information for other purposes, the School will ask for the individual's consent before doing so unless otherwise permitted under the PIPA or other applicable laws. Consent may be expressed or implied and can be in written or verbal form.
- iii. When the staff member provides consent for the collection, use, or disclosure of their personal information, that consent can be withdrawn at any time, on reasonable notice. However, withdrawing consent may have an impact on the benefits, programs, or other services that the School is able to provide to the staff member. Consent cannot be withdrawn when disclosure is required by law (e.g., EI premiums, Teacher Regulation Branch). Questions about withdrawing consent should be directed to the School's Privacy Officer.

d. *How the School Will Use and Disclose Personal Information*

- i. The School will endeavour to communicate the purposes for which personal information is collected at or before the time the information is collected.
- ii. In the ordinary course of operations, the School may collect the personal information of a staff member for the purposes of managing the School's relationship with that individual, including for the following purposes of:
 - 1) recruiting and hiring;
 - 2) improving and evaluating the School's programs and services;
 - 3) staffing, scheduling, and business and service delivery purposes;
 - 4) performance evaluation and monitoring;
 - 5) promotion, demotion, and discipline;
 - 6) investigating specific incidents involving employees;
 - 7) payroll and benefits administration;
 - 8) ensuring staff safety in the workplace; and

- 9) complying with the School's legal and regulatory obligations.
- iii. The School may disclose personal information about staff for these purposes or for other purposes permitted under applicable privacy laws, such as, where applicable, to the School's services and benefits providers, legal counsel, insurers, or law enforcement officials. The School will seek the staff member's consent for other uses of the individual's personal information where required under applicable laws.
- iv. The personal information the School may collect for these purposes includes information such as:
 - 1) name, contact information, and social insurance number;
 - 2) information about the staff member's employment history, education, and qualifications;
 - 3) financial and banking information needed for payroll and benefits administration;
 - 4) information about workplace performance, conduct, and attendance;
 - 5) information related to investigations into workplace incidents;
 - 6) information needed to respond to complaints or concerns;
 - 7) information about the staff member's health and medical status if needed to manage and administer employment or employment related benefits; and
 - 8) other information that the School is required by law to maintain in order to manage its relationship with staff members or to comply with the School's legal obligations.

e. *Privacy and Devices and Electronic Systems*

- i. The School may employ technologies that track, monitor, and allow it to audit user activity on devices and electronic systems owned or operated by the School. While reasonable personal use of such systems and equipment may be permissible during off-duty hours, Staff who choose to use such devices and systems to conduct personal business should be aware of the privacy implications of doing so. The School's systems may automatically track, retain access, and use information about a user's online and system activity, including when undertaken for personal use.
- ii. While such information is tracked and monitored for system security and maintenance purposes, the School reserves the right to access and use such usage and browser history in order to address security incidents or investigate Staff misconduct (including inappropriate workplace activity and time theft) and other incidents.

f. *Who the School Shares Information With*

The School shares personal information with the School's employees and contracted service providers who need to know such information for purposes related to the person's employment or engagement by the School, including the purposes described above and for

legal, administrative, and operational purposes. Some of the School's service providers, including online service providers, may store personal information using cloud services inside or outside of Canada.

g. *Limiting Collection, Use, Disclosure & Retention*

The School endeavours to limit the collection of personal information to what is necessary for the purposes for which it is collected, and the School retains personal information for only as long as it is needed for the delivery of services or for professional, legal, administrative or operational purposes. When it is no longer needed for these purposes, it will be securely destroyed.

h. *How the School Will Protect Personal Information*

The School protects personal information by ensuring security safeguards appropriate to the sensitivity of the information are in place, including through the use of the following measures:

- i. physical (i.e., locked filing cabinets, restricted access, appropriate security measures when disposing of personal information);
- ii. administrative (i.e., security clearances, access only on a "need to know" basis);
- iii. technological (i.e., passwords, firewalls, data disconnection from the internet, and regular backups) and training of employees; and
- iv. contractual, by requiring the School's service providers to commit to appropriate standards of privacy and data security.

(Schools must review the above list and remove/modify any safeguards that are not applicable)

i. *The Accuracy of a Person's Information*

The School will make reasonable efforts to ensure that personal information is as accurate, complete, and current as required for the purposes for which it was collected. In some cases, the School may ask a staff member to assist in ensuring that the person's information is accurate and update-to-date.

j. *Staff Member Rights*

- i. A staff member has a right to access their personal information within the control of the School. The School will receive and respond to requests for access to personal information in accordance with the PIPA and other applicable laws. In some cases, the School may refuse access to certain records or information such as where the disclosure of information may threaten someone else's safety, mental or physical health, where disclosure could be harmful to the personal privacy of a third party, or in order to protect other important interests, but the School will only do so to the extent this is authorized by applicable laws.

- ii. A person also has a right to challenge the accuracy and completeness of their personal information that is collected by the School. The School will receive and respond to all such requests in accordance with the requirements of the PIPA.
- iii. If a person wishes to make a request for access or correction of their personal information, the person may do so by submitting a written request to the School's Privacy Officer.

k. *Who to Contact if One Has Questions, Concerns or Complaints*

Questions, issues of concern or complaints about the processing or protection of a staff member's personal information should be directed to the School's Privacy Officer. The Privacy Officer will respond to and, where applicable, will investigate all complaints or concerns about violations of this Policy or other applicable privacy laws.

l. *Update to This Policy*

This Privacy Policy may be updated from time to time or as the School's review cycle.

Reference(s):

- [Personal Information Protection Act](#) (PIPA)
- [A Guide to B.C.'s Personal Information Protection Act for Businesses and Organizations](#)

Cross-reference(s): << add or omit based on school's policies >>

- [08.26 Personal Information And Privacy Policy For Employees And Volunteers](#)
- [04.17 Personal Information And Privacy Policy For Students And Parents Guardians](#)
- [08.26.01 Employee Expectations In Regard To Protecting Other's Personal Information And Privacy](#)
- [01.08 Critical Incident And Privacy Breach Response Policy](#)
- [04.05 Off-Site Activity & Off-Campus Learning Policy](#)