



**RICHMOND
CHRISTIAN
SCHOOL**

EST. 1957

POLICY NUMBER AND NAME: 08.26.01 EMPLOYEE EXPECTATIONS IN REGARD TO PROTECTING OTHER'S PERSONAL INFORMATION AND PRIVACY – 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

This Policy sets out our expectations of employees, volunteers, contractors, including persons authorized to access student records when planning for, or delivering, health services, social services or other support services to a student, (“Staff”) in relation to the access to, collection, use, disclosure, processing, maintenance, and protection of personal information (“Personal Information”) in compliance with the BC Personal Information Protection Act (the “PIPA”) and other applicable laws

RATIONALE

The students, parents/guardians, staff and other members of the school community entrust the School with personal information in a variety of areas such as their education, employment, history, and learning needs. They may also share other sensitive information with the School about their family life, lifestyle, or significant life events relevant to their educational needs or employment accommodations. All members of the school community regardless of their role have a right to privacy, and the School owes them a duty of confidentiality and a duty to take care in the protection and safekeeping of their personal information.

SCOPE

The administration of this Policy is the responsibility of the School Principal.

The Principal and the School's Privacy Officer, if the Principal is not the Privacy Officer, is responsible for the School's privacy management program. Staff should consult with the Privacy Officer if they have questions or require clarification of their duties and responsibilities under this Policy or in relation to student, parent/guardian, or staff personal information.

All school employees, contractors and volunteers (“**Staff**”) will understand and follow the School's expectations regarding protecting the personal information and privacy of others. This policy applies to all employees, contractors, volunteers and persons authorized to access student records when planning for, or delivering, health services, social services or other support services to a student (“Staff”). All Staff are to recognize the importance of privacy in relation to personal information the School receives and maintains about others (students, parents/guardians, and staff).

REVIEW HISTORY		
DATE	VERSION	CHANGES

1. DEFINITION:

- a. ***Personal Information*** - can be any information about an identifiable person that is collected, used, disclosed, or processed by the School in connection with its services, operations, or administration. It includes information in written, electronic, and verbal form, and can include any information from which a person's identity could be discovered or inferred. Personal information could include information such as:
- name and contact information;
 - educational history and family information;
 - grades, performance, or conduct;
 - information about past communications with the School;
 - occupation, work, professional, and family lifestyle information;
 - information about learning needs; and
 - next of kin and family information.
- Personal information*** does not include publicly available business contact information, such as email address and telephone number, that would allow a person to be contacted at work.
- 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 the Schools operations.
- c. ***Staff*** - For the purpose of this policy, "staff" refers to employees, volunteers, contractors and persons authorized to access student records when planning for, or delivering, health services, social services or other support services to a student at the School.

2. PROCEDURES:

The Principal will ensure that all Staff are made aware of this policy.

- a. ***Accessing and Using Personal Information***
- The School collects, uses, and discloses personal information with the knowledge and consent of individuals in the School community, and for the purposes of providing educational, employment, and related support services to them. Given the sensitivity of the personal information the School collects and uses, it is important that access to personal information by Staff takes place only on a strictly need to know basis.
 - All Staff must ensure that any access to and use of personal information is undertaken by them only for purposes that are necessary to carry out their

authorized duties. For example, it is appropriate to access and use personal information in order to:

- 1) plan, deliver, develop, schedule, and deliver educational services to students;
- 2) communicate with students or other individuals and respond to their questions, complaints, or concerns;
- 3) process tuition and fee payments for school services;
- 4) ensure the safety of students, visitors, and staff while on campus;
- 5) enforce school rules and policies;
- 6) update information or complete records, when it is necessary, for administrative, legal, or operational requirements;
- 7) undertake investigations into conduct issues or incidents; and
- 8) evaluate and improve school services and operations.

- iii. It is not appropriate for Staff to access personal information or a student's or staff member's files out of curiosity, personal interest, or for other personal purposes. Staff who engage in such activities will be subject to disciplinary action, up to and including dismissal.

b. *Monitoring, Auditing, And Tracking*

All Staff are to be aware that access to and use of the School's facilities and its files and electronic information systems may be monitored and audited at any time, including the dates, times, and duration of user access and the files and materials accessed. The School reserves the right to access, collect, use, and disclose this information for employment purposes and for the purposes of complying with its professional and legal responsibilities in relation to personal privacy.

c. *Disclosure Of Personal Information*

- i. All Staff must take care to ensure that personal information is maintained in strict confidence, and it is only shared with third parties for purposes that are necessary in order to deliver authorized educational programs and related services or where required by law. Staff should not be discussing personal (student, parent/guardian, and/or staff) information or incidents outside of the workplace, even if the person is not identified by name. Even while at the School, staff must exercise discretion and refrain from discussing the personal information of others in circumstances where the conversation could be overheard by unauthorized individuals. Such discussions should be limited to those necessary for a legitimate educational, administrative, operational, and/or legal purpose.
- ii. If any member of the Staff receives a request or demand for access to personal information from a third party, including law enforcement officials or legal counsel, the request must be directed to the Principal for a response.

d. ***Protecting Personal Information***

All Staff must exercise care at all times to avoid any inadvertent loss or disclosure of personal information, including by:

- i. Keeping School records and physical files secure by storing them in locked cabinets or other secure locations and ensuring they are not left unattended or exposed where they could be viewed, accessed, copied, or removed by unauthorized persons.
- ii. Protecting the security of the School, by keeping controls over all keys, passwords and pass cards, and keeping doors and entries locked outside of business hours.
- iii. Maintaining all devices or paper files containing personal information.
- iv. School files should not be removed from the School, except when authorized by the Principal.
- v. Refraining from storing personal information on personal electronic devices (e.g., home computers, smart phones, USBs, tablets, or laptops).
- vi. Not remotely accessing electronic systems used to access or store personal information, except as authorized by the School. Such access, when permitted, must be secure, which means accessing such systems over secure Wi-Fi networks and not viewing or storing information on personal or shared devices if it might be accessible to unauthorized persons.
- vii. Keeping strict controls over passwords, login IDs, and credentials used to access electronic systems through which Personal Information is stored or accessible, this includes by not sharing passwords or leaving them in the open where they may be seen or used by others.

e. ***Reporting Privacy Breaches***

All Staff must immediately report to the Privacy Officer (and Principal if the Principal is not the Privacy Officer) any unauthorized collection, use, disclosure, or the loss or theft of any Personal Information of which they become aware there is any prospect of harm, embarrassment, or loss to affected individuals. All Staff are also expected to provide their full cooperation to the Principal and Privacy Officer (if the Principal is not the Privacy Officer) in responding to or investigating privacy breaches.

f. ***Training And Privacy Awareness***

All Staff are to be familiar with and remain current with respect to changes in the School's privacy management policies, procedures, and processes. Staff are also expected to participate in privacy training when offered by the School.

g. ***Changes To This Policy***

The School reserves the right to make changes to this Policy at any time. Such changes will be effective when posted. Employees, contractors, and volunteers are expected to review this

Policy from time to time, or when instructed to by the Principal, to become aware of any changes that have been made.

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>>

- [04.17 Personal Information And Privacy Policy For Students And Parents Guardians](#)
- [08.26 Personal Information And Privacy Policy For Employees And Volunteers](#)
- [08.26.01 Employee Expectations In Regard To Protecting Other's Personal Information And Privacy](#)
- [04.16 Student Records](#)
- [01.08 Critical Incident And Privacy Breach Response Policy](#)