



Personal Information Privacy Policy

Saplings Nature School

August 2022

Rationale

Saplings Nature School is committed to safeguarding the personal information of staff, parents, students, and website visitors. Any personal information provided to us is collected, used and disclosed in accordance with the School's privacy policy and the British Columbia Personal Information Protection Act (PIPA).

Note: "Staff" refers to any employee or volunteer of Saplings; "Parent" refers to the parent, guardian, or other legal representative of a student; "Student" refers to a prospective, current, or past student of Saplings.

Policy

In accordance with PIPA, Saplings:

- Will ensure that personal and financial information is handled appropriately and securely.
- Will not collect, use or disclose personal information without the consent of the individual (unless otherwise permitted under the Act).
- On or before collecting personal information about an individual from the individual, Saplings will disclose to the individual verbally or in writing the purposes for the collection and, on request, contact information.
- Saplings will only collect, use or disclose personal information for the purposes that a reasonable person would consider appropriate in the circumstances and that fulfill the purposes Saplings has disclosed or are otherwise permitted under the Act.
- Will advise students, parents and employees what personal information is specifically being collected
- Will be transparent about the use and disclosure of personal information
- Will obtain consent for the collection, use and disclosure of personal information
- Will only use and disclose the information in accordance with stated purposes
- Will assign a staff member to act as "Privacy Officer", responsible for creating and maintaining PIPA-specific policies and processes to be followed, including a process for responding to complaints about compliance with PIPA.

Saplings 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. You may ask for the most recent update of this Personal Information Privacy Policy at the school office. This Personal Information Privacy Policy may be supplemented or modified by agreements entered into between Saplings and an individual from time to time.

Procedure

Personal Information

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.

Personal information includes, but is not limited to a person's name, address, birthdate, email address and phone number. Saplings does not collect any information other than that provided by a student's family. Personal information collected will be used solely for the purpose for which it was collected. Saplings does not disclose information about any family or website visitor without consent unless required to do so by law enforcement or otherwise provided by law.

Computer use is monitored in accordance with the Computer, and Internet Policy: (*Saplings expects that the use of school or personal technology for the purpose of supporting educational programs and the school's administrative services will occur in an ethical, responsible and legal manner.*) Personal information is collected in the operation and maintenance of these systems.

Website

Saplings uses an analytic tool to measure website traffic, and marketing effectiveness when you browse our website. This data may include information such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser. Saplings does not use cookies to collect anonymous traffic data.

Privacy Officer

Saplings is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school designates an individual who is accountable for the school's compliance with Privacy Principles and makes 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:

Name: Saplings Manager

Phone: 604-358-0191

Email: saplings.acct@gmail.com

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 email or calling the school office. If necessary, individuals will be referred to use the school's complaint procedure and appeals policies.

Identifying Purposes

Saplings will, before or at the time personal information is collected, identify the purposes for which the information is collected, used and disclosed. Saplings collects and uses personal information to provide students with the best possible educational services enunciated by its Mission statement.

Most of the information the school collects comes to the school directly from parents and 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 the school, the school will ask you to provide the information that enables it to complete the registration process. This includes, but is not limited to

information on academic, health, and personal matters needed by the school to provide the best possible education and co-curricular programs.

Consent

Saplings 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, Saplings will take into account both the sensitivity of the personal information and the purposes for which Saplings 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 their mailing address and requests information regarding a particular service, consent to use the address to provide the requested information may be implied.

On giving reasonable written notice to Saplings, an individual may withdraw consent to the collection, use or disclosure of his or her personal information. Upon notice of withdrawal of consent, Saplings will notify the individual of the likely consequences of withdrawing his or her consent and, except where otherwise required or permitted by law, Saplings will stop collecting, using or disclosing the personal information as requested. If a person provides Saplings 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 Saplings to collect, use and disclose such personal information for the purposes set forth in this Personal Information Privacy Policy.

Accuracy of Information

Saplings will take appropriate steps to ensure that personal information collected is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used or disclosed. Saplings relies upon parents accurately and in full, providing requested information.

It is an individual’s responsibility to, in written form, request that Saplings correct any error or omission in any personal information that is under Saplings’ control. Saplings will, as appropriate, amend the information as requested and send the corrected personal information to a third party as necessary.

Collection, Use, Disclosure, and Retention

Saplings will limit the personal information collected to that information necessary for the purposes identified by the school. Saplings 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. Saplings 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 expected by Sapling’s families.
- 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.

- to establish, manage and terminate employment relationships and for other purposes identified when the information is collected.
- To communicate with and on behalf of students, parents, employees or former employees, and alumni, process applications and ultimately to provide students with educational services and co-curricular programs;
- To communicate with external parties in the course of the school's activities including marketing, social media posts, publications such as yearbooks and newsletters, and websites;
- To provide students with the educational services enunciated by the Mission statement of the school, including the student's school activities, performance or behaviour such as attendance records or grades. This may include electronic information on academic, health, and personal matters needed by the school to provide the best possible education and co-curricular programs;
- To meet legal and regulatory requirements, including the *Independent School Act*;
- To ensure communication in the event of emergency;
- To investigate breaches of law, complaints and breaches of policy or the Code of Conduct;
- To provide a safe environment for Faculty, Staff and students

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. Saplings may use anonymous information, such as information collected through surveys or statistical information regarding students, to constantly improve our school. Saplings 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.

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.

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.

Examples of how Saplings may disclose personal information

When Authorized by Parents or Caregivers

- 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.
- 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.

- In some cases, when communication is over the telephone or zoom, your consent to the use and/or disclosure of your information will be obtained verbally. In other cases, such as when you communicate through email, your consent will be obtained electronically.

When Required by Law

- 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.
- 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

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

Outside Service Suppliers

With express consent, Personal information about employees, volunteers, parents and/or students (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.

- Saplings may contact outside organizations to perform specialized services such as printing, student assessments, market research or data processing. [For example, the school may give a 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 Saplings 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.
- Personal information about staff may be collected and used and disclosed in the course of the operation of building security systems, including video and other surveillance systems.

Employees and Volunteers

- 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;
- payroll and related information including, social insurance number, rate of pay, hours of work, deductions, bank account information, any court orders;
- benefit information including social insurance number, premiums or contributions, coverage information, date of birth, marital status, dependent information, medical information;
- 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;

- information related to the volunteer's services, including availability, schedule, duties, reviews, and related notes and memorandums and documentation related to volunteer qualifications
- other personal information as required or permitted by law.
- 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 Saplings including accountants, lawyers and consultants;
- Any entities related to Saplings as reasonably required by the operations of Saplings and the SAP board of directors.

Safeguarding Personal Information

Saplings will protect personal information by security safeguards that are appropriate to the sensitivity level of the information. In the course of daily operations, access to personal information is restricted to authorized employees who have a legitimate reason for accessing it.

- Teachers will have access to personal information about students but not your account with the school.
- 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 and Staff 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.
- 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.

Accessing Personal Information

(For full information, see student records policy)

Saplings 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. 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.

A parent may access and verify school records of their student, 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.

A student (capable of exercising PIPA rights) and parents/guardians of a student should be permitted (unless restricted by a court order) to:

- examine all student records kept by a school pertaining to that student, while accompanied by the Head of School or a person designated by the Head of School to interpret the records;