

DIAMOND SCHOOL

Personal Information Privacy Policy for Parents & Students

Introduction

Safeguarding personal information of parents and students is a fundamental concern of Diamond School. The school 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 Diamond School regarding the collection, use and disclosure of personal information about students and parents, including the steps the school has taken to ensure personal and financial information is handled appropriately and securely.

Diamond 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 giving notice of the revised policy. You may ask for the most recent update of this Personal Information Privacy Policy at the school office. From time to time, this Personal Information Privacy Policy may be supplemented or modified by agreements entered into between Diamond School and an individual from time to time.

Definitions

"Personal information" in this Policy means any information about an identifiable individual, as further defined under British Columbia's *Personal Information Protection Act* or other applicable laws. Personal information of adults excludes any publicly available information as designated under applicable laws, such as information available from a public directory or registry.

"Parent" means the parent, guardian, or other legal representative of a student.

"Student" means a prospective, current, or past student of Diamond School.

Accountability

Diamond School is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the Head of School is appointed as the school's Privacy and Information Sharing Officer and is accountable for the school's compliance with this Policy. Please contact the Head of School with any requests or concerns.

Type & Purpose of Information

Diamond School will, before or at the time personal information is collected, identify the purposes for which the information is collected, used and disclosed.

Diamond School collects and uses personal information to provide students with the best possible educational services in line with the schools' mission and to ensure the safety of everyone in our school community. Most of the information the school collects comes 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 for information that enables it to complete the registration process. This also includes information on academic, health, and personal matters needed by the school to provide an appropriate school program and ensure the safety of students and employees.

Diamond School also collects 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.

Consent

Diamond 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, Diamond School will take into account both the sensitivity of the personal information and the purposes for which the information will be used. 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 may be implied.

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

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

Limited Collection

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

Use, Disclosure and Retention

Diamond 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.

(1) Use

Diamond School 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 families expect.
- to enable the schools to operate its administrative functions, 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.

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.

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

(2) Disclosure

Diamond 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. The following are some examples of how Diamond School may disclose personal information:

- 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 parent meetings, fundraising, events, etc.

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

(3) Disclosure Required by Law

In certain circumstances, the school is required by law to disclose specific information. The type of information that is legally required to be disclosed 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 precautions are taken to satisfy the school that the authorities making the request have legitimate grounds to do so.

(4) Disclosure 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.

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

(5) Outside Service Suppliers

At Diamond School, outside organizations are sometimes, although infrequently, contacted to perform specialized services such as printing, student assessments, market research or data processing. Suppliers of specialized services are given only the information necessary to perform those services, and Diamond 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.

(6) Restricting Sharing Information

If an individual wishes to limit the sharing of personal information as permitted by law, the individual should contact the school office and submit a written letter specifying which items of personal information are to be limited and to whom these items are to be restricted. Please remember that certain agencies, by law, have access to certain types of personal information.

(7) Length of Time 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.

Accuracy

Diamond School 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.

(1) How to Update or Correct Information

An individual may, upon written request to Diamond School, request a correction of an error or omission in any personal information that is under Diamond School's control. As appropriate, the information will be amended as

requested. Where necessary, the corrected personal information will be sent to any third party to which it has been disclosed during the preceding year.

Safeguarding Personal Information

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

(1) Employee Access

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 a family's financial account with the school.

Employees are appropriately educated about the importance of privacy and they are required to follow all policies and procedures regarding handling of personal information.

(2) Student Files

Student files are stored in secured filing cabinets. Access is restricted to only those employees who, by nature of their work, are required to see them.

(3) Electronic Security

Electronic files are managed appropriately with passwords and security measures that limit access by unauthorized personnel. Security practices are reviewed periodically to ensure that the privacy of personal information is not compromised.

Individual Access

Diamond School 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.

(1) How to Access Your Personal Information

Individuals may request in writing to 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 families have provided to the school themselves.

(2) Parent Access to Student Personal Information

A parent may access and verify school records of the 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.

Inquiries & Complaints

Diamond School 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 administration.

Individuals may question compliance with the above principles. Questions, concerns and complaints about privacy, confidentiality and personal information handling policies and practices of the school should be directed to the administration by calling the school office or writing to the attention of the school Principal.