



ST. MARGARET'S SCHOOL  
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Canada

# OUR PRIVACY COMMITMENT

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## St. Margaret's School

### OUR PRIVACY COMMITMENT

*St. Margaret's School (SMS) is committed to maintaining the privacy and security of your personal information. This Privacy Policy documents how we at St. Margaret's use and manage personal information provided to or collected by the School and has been developed in compliance with the BC Personal Information Protection Act. SMS may, from time to time, review and update this Policy, taking into account new legislation, technology, and changes to School operations and practices, to make sure it remains current and appropriate.*

#### **Your privacy is important**

Protecting the information of individuals who come into contact with St. Margaret's School has been standard practice for many years. Our goal is to maintain the highest quality of service and integrity in all of our dealings.

SMS is committed to upholding the privacy principles underlying the BC Personal Information Protection Act. Our SMS Privacy Principles and Privacy Statement are included with this Policy.

#### **What is personal information?**

"Personal" information is defined as information or an opinion that allows someone to identify the individual that the information or opinion is about. It can range from basic contact information we need in order to communicate with you, to records and assessments fundamental to students' ongoing education, to sensitive health information that enables the School to discharge its duty of care.

There are some items which are excluded from the definition, such as your business contact information, work product information and certain publicly available information.

## **What kind of personal information does the School collect and how do we collect it?**

The type of information the School collects and holds includes (but is not limited to) personal information about:

- students/prospective students, parents and guardians before, during and after the course of a student's enrolment at the School
- job applicants, staff members, volunteers and service contractors
- alumnae, donors and friends of the School

Wherever practical, we will collect personal information from you directly or from your authorized representative. We will collect personal information by printed forms, face to face meetings and interviews, telephone calls and e-mail. Generally, personal information from parents and students (e.g. academic, health and personal matters and contact information) is collected on student application, registration, enrolment, residence, food service and medical forms. Personal information relevant to terms and conditions of appointment or engagement, (e.g. contact information, personal and professional history, qualifications, references, criminal records checks, any court orders, payroll and benefits information) is collected from job applicants, employees, service contractors and volunteers by Human Resources, Finance, and other administrative departments. Personal information from alumnae, donors and friends (e.g. contact and biographical information) is collected by the Development Office. In some circumstances the School may be provided with personal information about an individual from a third party, for example a report provided to the School Nurse by a medical professional or a reference provided by an employer for a job applicant.

Except where permitted or required by law, we will not collect personal information without the consent of the individual concerned. For example, an organization is permitted to collect employee personal information without the consent of the individual where the collection is reasonable for the purposes of establishing, managing or terminating an employment relationship between the organization and the individual.

## **How will the School use the personal information you provide?**

The information we collect is necessary for the School to carry out its functions and to provide the services or carry out the transactions you request, expect or authorize. The information may be used for the following specific purposes:

1. Providing the best possible education and co-curricular programs for students as enunciated by the School's mission statement, including
  - understanding and assessing the ongoing needs of students and parents or guardians and offering services to meet those needs throughout the whole period the student is enrolled at SMS
  - determining eligibility for services, funding and government grants
  - evaluating and processing applications (e.g. admission of new students, re-enrolment of returning students, scholarship applications)

- communicating with and keeping parents and guardians informed about matters related to their children’s education and School activities, performance or behaviour
  - student assessment and record keeping (e.g. attendance records, grades)
  - satisfying the School’s obligation to discharge its duty of care (e.g. emergency contact, health care, learning support, psychological services, child protection)
  - enabling the School to operate its administrative function and accounting services (e.g. tuition fee payment and collection)
  - compliance with legal and regulatory requirements
2. Managing employment relationships, including
- administering employment or service contracts, recruiting volunteers, assessing and engaging applicants, training and assessing employees, recording working time, documenting absences, planning, providing compensation, benefits, fees for service and expense claims
  - communicating with individuals
  - complying with legal and contractual obligations (e.g. criminal records check, deductions and statutory returns, pension provisions, health and safety and insurance purposes)
  - enabling the School and its volunteers to work together
3. Marketing, fundraising and development, including
- producing communications and publications materials to promote School activities and events and encourage SMS community involvement in the life of the School
  - marketing and seeking donations for the future growth and development of the School
  - Parent Auxiliary and Alumnae Association activities

SMS may use anonymous information, such as information collected through surveys or statistical information regarding students, to constantly improve our School. Personal information may also be used for other purposes, subject to obtaining your prior consent for such use.

### **Disclosure of personal information**

Within the organization of St. Margaret’s School, the personal information you provide will be disclosed only on a “need to know” basis and only for the purpose it was collected. It also may be necessary for us to disclose the personal information we collect to a party outside the School for legal or regulatory purposes, or to service providers or agents who perform various functions for us. We will seek agreement from these third parties to safeguard confidential information about you and your association with the School.

The School may disclose personal information held about an individual to:

- parents and guardians
- government departments, bodies and agencies (e.g. Canada Revenue Agency, Workers Compensation Board, Ministry of Education)

- other educational institutions (e.g. transfer of student records for the ongoing education of the student)
- medical practitioners
- people providing services to the School, including tutors, payroll and benefits providers, collection agencies, outside suppliers contracted to provide data processing and internet services, and international student recruitment agencies
- para-educational and administrative services operated by the School (e.g. phoning committees, participation groups, parent meetings, fundraising, events, annual general meetings)
- court and legal proceedings
- anyone you authorize the School to disclose information to

If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why, and that they can access that information if they wish.

In addition to the business and statutory purposes for which we require your personal information, SMS may wish to facilitate communication with or among members of the School community by circulating your personal contact details in a class list, employee list or School or alumnae directory.

As you may know, the School from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. We do not disclose our client/donor lists or other personal information to third parties for their own marketing purposes. In addition to marketing and development purposes, SMS may also wish to use your personal information for Parents Auxiliary and Alumnae Association activities or so that the Development Office can keep you informed about School services, events and activities that may be of interest or benefit to you. We may also publish details about you in our *In Touch* magazine and on our SMS website. Photographs may be used in School communications, publications and marketing materials.

### **Consent to use your personal information**

St. Margaret's School will seek your consent to collect, use, or disclose personal information, except where provided by law, and will use the information only for the purpose it is collected. Unless the purpose is obvious, we will state the purpose either at or before the time the information is collected.

In determining whether consent is required and, if so, what form of consent is appropriate, SMS will take into account both the sensitivity of the personal information and the purposes for which the School will use the information. Consent may be express, implied (including through use of "opt-out" consent where appropriate,) or deemed.

We may obtain your express consent verbally in person, over the telephone or in writing (e.g. in a signed consent, e-mail or application form.) Consent may also be implied, as when we receive personal information from you that enables us to provide education to your children or to employ you. In such cases, your consent to allow us to deal with that personal information in a

reasonable manner would be implied. An individual is “deemed” to consent to collection, use or disclosure of personal information if the individual voluntarily provides it for a purpose that would, at the time, be considered obvious to a reasonable person.

Providing us with your personal information is your choice. You may withhold consent or withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. If you choose to withhold or withdraw your consent, however, the services that we can provide to you may be limited. For example, if personal information required for education or employment purposes is not obtained, the School may not be able to enroll or continue to enroll your child, or to hire or continue to employ you.

Most personal information for employees and volunteers is collected, used and disclosed for the purposes of establishing, managing and terminating the employment or volunteer relationship. In most cases, consent is not required.

Your consent to the use of your personal information for the following purposes is strictly voluntary:

- to publish contact lists and directories not essential for education, employment, statutory or regulatory purposes or to protect the vital interests of the individual
- for School advancement, development and fundraising
- for Parents Auxiliary purposes
- for Alumnae Association purposes
- to enable receipt of School communications, publications, notices, mail-outs and marketing materials
- to display personal photographs in School communications, publications, notices and marketing materials.

If you do not agree to have us use your personal information for any of the above purposes, or if you choose to limit the sharing of your personal information, you may withhold or withdraw your consent by contacting us as set out in this Policy in the section called “Contacting the SMS Privacy Officer.”

Upon notice of withdrawal of consent, SMS will notify you of the consequences of withdrawing your consent and, except where otherwise required or permitted by law, SMS will stop collecting, using or disclosing the personal information as requested.

#### *Consent and 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.

The School respects every parent’s right to make decisions concerning their child’s education. Generally, we will refer any requests for consent and notices in relation to the personal information of a student to the student’s parent or guardian. The School will treat consent given by parents as consent given on behalf of the student, and notice to parents will act as notice given to the student.

However, there may be occasions when parental access is denied, such as where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the School's duty of care to the student. Where provided by law and circumstances so warrant, the School may also allow students to give or withhold consent to the use of their personal information, independent of their parents.

### **Protection of personal information**

SMS staff members respect the confidentiality of personal information and the privacy of individuals. Access is restricted to those SMS authorized employees who need to know specific personal information in order to provide services to you.

Employees and volunteers will be appropriately educated about the importance of privacy and they are required to follow the School's policies and procedures regarding the handling of personal information.

The School protects and controls the personal information in our custody or control with physical, electronic and procedural safeguards appropriate to its sensitivity against misuse, loss, and unauthorized access, modification or disclosure.

We will not retain personal information for longer than necessary to fulfill the purpose for which it was collected, or as required by law. If personal information is no longer required, it will be destroyed or rendered anonymous.

#### *Privacy on the Internet*

We recognize that many individuals may have privacy concerns regarding the Internet. We share your concerns and are committed to protecting the privacy of personal information on the web through the implementation of federal and provincial privacy legislation and policy on unsolicited consumer e-mail, otherwise known as spam. While we endeavor to protect and safeguard, to the best of our ability, all personal information entrusted to us, we are not responsible for information that you may give electronically to outside agencies in any relationship with St. Margaret's School.

Because e-mail over the Internet is generally unencrypted, it is not considered secure. Staff members and students can contribute to the confidentiality of their personal information by not disclosing their designated username and password for access to their SMS online account to anyone.

SMS contracts with third parties to host the SMS website and to provide Net Directory Services, such as the St. Margaret's School Alumnae E-mail Directory. This directory is for official St. Margaret's School alumnae use and for individual communication of a personal nature between members listed. Strict data security precautions are in place; however, St. Margaret's School does not assume responsibility for, or guarantee the accuracy of, information contained in the directory. Our SMS website may contain links to other websites. All links to other websites are subject to acceptance by St. Margaret's School, however when you click onto one of those links,

you are contacting another website for which SMS has no responsibility or control. SMS does not generate cookies, a standard technology that installs information on a visitor's computer to permit a website to recognize future visits by that computer.

### **Updating personal information**

We make every reasonable effort to ensure the accuracy and completeness of the personal information we collect, store, use and disclose. On written request to the Privacy Officer, we will inform you of the existence, use, and disclosure of your personal information. Except as provided by law, you have the right to obtain access to any personal information the School holds about you and to advise us of any perceived inaccuracy. SMS will, as appropriate, correct the information as requested and send the corrected personal information to each third party to which it has disclosed the information during the preceding year.

### **Contacting the SMS Privacy Officer**

If you have any questions, concerns or complaints about our privacy practices or a request to access or correct your personal information, or should you wish to withhold or withdraw your consent for us to use your personal information for any of the purposes contained in this Privacy Policy, please contact the SMS Privacy Officer directly at the following address:

Mail: St. Margaret's School  
1080 Lucas Avenue  
Victoria, BC  
V8X 3P7  
Canada  
Attention: Privacy Officer

E-mail: [privacy.officer@stmarg.ca](mailto:privacy.officer@stmarg.ca)

Fax: (250) 479-3244

If you choose to limit the sharing of your personal information, you may withhold or withdraw your consent by submitting 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 have access to certain types of personal information. If necessary, individuals will be referred to use the School's complaint procedure and appeals policies.

Otherwise, we will presume you understand and accept the terms as set out in our SMS Privacy Policy and will continue to collect, use and disclose your personal information as necessary and reasonable within our Privacy Policy.

## SMS PRIVACY PRINCIPLES

### 1. **Accountability**

SMS is accountable for personal information under its control and has designated a Privacy Officer and Advisory Committee who are responsible for the School's compliance with the legislation and regulations.

### 2. **Identifying Purposes**

Unless the purpose is plainly apparent, SMS will state the purpose for which personal information is collected at or before the time the information is collected.

### 3. **Consent**

SMS will collect, use and disclose personal information with the knowledge and consent of the individual except where inappropriate, for example where legal, medical, or security reasons may make it impossible or impractical to seek consent. Your consent can be express, implied or given through an authorized representative such as a lawyer or agent.

### 4. **Limiting Collection**

SMS will limit the collection of personal information to that which is reasonable and necessary for the purposes identified.

### 5. **Limiting Use, Disclosure, and Retention**

SMS will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes. We do not provide third parties with your personal information except in certain circumstances. For example, we may need to disclose the personal information we collect to service providers or agents who perform various contracted functions for us. We also may be required to provide personal information to third parties for legal or regulatory purposes.

### 6. **Accuracy**

SMS will undertake to ensure that personal information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. We rely on you to provide only information that is accurate, complete and up-to-date and to inform us of any changes when they occur.

### 7. **Safeguards**

SMS will protect the personal information in its custody or control by security safeguards appropriate to the sensitivity of the information.

### 8. **Openness**

SMS will make specific information about its policies and practices relating to the management of personal information readily available.

### 9. **Individual Access**

You have the right to know the existence, use and disclosure of your personal information. Upon request, unless prevented by law, SMS will provide you or you authorized representative with access to that information. Any reasons for denying access will be provided upon request. You also have the right to challenge the accuracy and completeness of the information and have it amended as appropriate.

### 10. **Challenging Compliance**

Inquiries, challenges or questions regarding our privacy practices may be directed to the SMS Privacy Officer.

## SMS PRIVACY STATEMENT

St. Margaret's School is committed to maintaining the privacy, confidentiality and security of your personal information.

In meeting our privacy commitment, we will collect, store, use and disclose personal information only as needed to:

- provide the educational services required by our students, including the establishment and maintenance of our relationship with parents and guardians;
- establish, maintain or terminate employment and service contract relationships;
- administer the business and development of the School; and
- meet legal, regulatory and contractual obligations.

In summary, we will:

- inform you of our purposes for collecting personal information from you;
- seek your consent prior to collecting, using or disclosing your personal information for the purposes we have indicated;
- protect and safeguard all personal information in our custody or control;
- provide you access to personal information we hold about you and have it corrected, if necessary; and
- retain your personal information only as long as is necessary for the purposes it was collected.