



# PRIVACY POLICY

## PERSONAL INFORMATION PRIVACY POLICY FOR EMPLOYEES AND VOLUNTEERS

Safeguarding the personal information of employees and volunteers is a primary concern of King's Christian Collegiate. We are committed to meeting or exceeding the privacy standards established by federal legislation entitled *Personal Information Protection and Electronic Documents Act* (PIPEDA). It is a biblical norm to respect the dignity of individuals, including the appropriate collection, use, and storage of personal information.

This *Personal Information Privacy Policy for Employees and Volunteers* details the policies and practices of King's Christian Collegiate regarding the collection, use, and disclosure of personal information about employees and volunteers. This Personal Information Privacy Policy for Employees and Volunteers may be modified or supplemented from time to time, and in such instances all persons affected by the policy will be notified of the changes.

### Definitions

In this Personal Information Policy for Employees and Volunteers, "personal information" means any information about an identifiable individual excluding the name, position name or title, business telephone number, business address, business e-mail and business fax number, as well as any publicly available information such as information found in a public telephone directory or public registry. Employee personal information is personal information collected, used or disclosed solely for the purposes reasonably required to establish, manage, or terminate an employment relationship, but does not include personal information that is not about an individual's employment.

## TEN PRIVACY PRINCIPLES

### 1 Accountability

At King's Christian Collegiate the principal is the Privacy Officer responsible for implementing the privacy policy for employees and volunteers.

### 2 Identifying purposes

#### A Employees

King's Christian Collegiate collects, uses, and discloses personal information about employees to establish, manage, and terminate the employment relationship, and for such other purpose(s) as identified when the information is collected.

*For example:*

- personal information collected during the hiring process such as the information on resumes, application forms, criminal record checks, and information collected from references;



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- payroll and related information including SIN, pay scale, hours of work, deductions, bank account information, court orders;
- benefit information including SIN, premiums or contributions, coverage information, dependent information, date of birth, marital status, medical information;
- performance information including work history, attendance history, performance and relationship reviews, discipline and related memos and notes, documentation related to qualifications and professional growth;
- other personal information as required or permitted by law.

### B Volunteers

King's Christian Collegiate collects, uses, and discloses personal information about volunteers for the purposes of recruiting volunteers, and establishing and managing an effective volunteer program, and for such other purpose(s) as identified when the information is collected.

*For example:*

- information collected, used, and disclosed in the recruiting process including information on resumes, application forms, criminal record checks, and information collected from references;
- information related to the volunteers' services including availability, schedule, duties, performance reviews, and notes, memos, and documentation related to qualifications.

### C In addition

Personal information about employees and volunteers, 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, newsletters, and Websites;

Personal information about employees and volunteers may be collected regarding the operation and maintenance of computers, internet and e-mail, as these are monitored in accordance with the school's Policy on these systems;

Personal information about employees and volunteers may be collected, used and disclosed in the course of the operation of building security systems, including video and other systems.

### 3 Consent

In most cases consent is not required for personal information collected, used, or disclosed for the purpose of establishing, maintaining or terminating employment or a volunteer relationship. King's Christian Collegiate will take into account the sensitivity and intended use of personal information and where appropriate require consent to be expressed, or implied, or deemed.



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## 4 Limiting collection

Personal information collected will be limited to that which is necessary for the purpose(s) identified.

## 5 Limiting use, disclosure, and retention

Personal information of employees and volunteers will only be used and disclosed for the purpose(s) for which it was collected and for which consent has been obtained, implied, or deemed. Personal information will only be retained for as long as is necessary for the fulfillment of the purpose(s).

NOTE: King's Christian Collegiate may disclose personal information to others in connection with the purpose(s) for which it was collected as consented to by the individual or as required or permitted bylaw. The list below should be reviewed to ensure disclosures are applicable.

*Third parties may include:*

- government bodies, departments and agencies (e.g. WSIB, Ministry of Education, CCRA);
- payroll outsourcers;
- insurance companies, benefit and pension plan administrators;
- advisors to the school such as accountants, lawyers, consultants;
- organizations reasonably required by the operations of the school, such as Ontario Alliance of Christian Schools (OACS), (Ontario Christian School Administrators Association (OCSAA), Ontario Christian School Teachers Association (OCSTA), Christian School International (CSI), Canadian Hallmarks Institute (CHI).

King's Christian Collegiate does not sell, lease, or trade information about employees and volunteers. Suppliers of specialized services (e.g. yearbook publishers) are given only the information necessary to provide those services, and King's Christian Collegiate takes appropriate steps to ensure that such information is securely transferred and stored, and is used only for the purpose(s) for which it was disclosed to the service provider. If an individual seeks to limit the sharing of personal information as permitted by law, s/he must submit a written letter to the Privacy Officer specifying which information is to be limited and to whom this information is restricted. The Privacy Officer will advise the individual whether the request can be carried out.

Personal information will be retained only for the time required to fulfill the purpose(s) for which it was collected. When the information is no longer needed to fulfill the purpose(s) for which it was collected, it will be destroyed or made anonymous.

## 6 Accuracy

Personal information shall be kept as accurate, complete and up-to-date as is necessary to fulfill the purpose(s) for which it was collected. Employees and volunteers are responsible for providing current information to the school.



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## 7 Safeguards

Personal information will be protected by appropriate safeguards to prevent unauthorized access or uses. Employees and volunteers will be appropriately educated about the importance of privacy, and will be required to follow the school's policies and procedures regarding personal information.

Employee and volunteer files will be stored in secure filing cabinets and access to personal information will be restricted to authorized and legitimate persons. Electronic files will be password protected. The school's security practices will be reviewed in a timely fashion to ensure the privacy of personal information.

## 8 Open policy

King's Christian Collegiate will readily make available its policies and practices regarding the protection of personal information.

## 9 Individual access

King's Christian Collegiate shall give an employee or volunteer access to his/her personal information file in accordance with the law. An employee or volunteer may access and verify any personal information with appropriate notice, and may provide new and current information to the Privacy Officer to include in the file.

## 10 Questions and concerns

All questions and concerns relating to the schools policies and procedures about employee and volunteer personal information should be directed to the Privacy Officer.