



## Personal Information Privacy Policy for Parents and Children

### **Note to Parents: Our Commitment**

Both the Nelson Waldorf School and the Childcare Centre are operated by the same not-for-profit legal entity: The Nelson Waldorf School Association. Throughout the rest of this document both the School and the Childcare Centre will be referred to together as “the School.”

Safeguarding personal information of parents and children is of fundamental concern to the School. We are 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 the School regarding the collection, use and disclosure of personal information about children and parents, including the steps the School has taken to ensure personal and financial information is handled appropriately and securely.

The School may amend this Personal Information Privacy Policy when the School considers it appropriate to do so, and any such changes will be effective upon giving notice of the revised policy by all-school electronic notice. A copy of the most recent update of this Personal Information Privacy Policy is available at the School office, on our website, and in our online student information system. This Personal Information Privacy Policy may occasionally be supplemented or modified by agreements entered into between the School and an individual, based on consideration for specific circumstances.

## Principles



In order to meet its commitment to parents and children, and its legal obligation under the British Columbia Personal Information Privacy Act, the School will follow ten principles:

1. It will be accountable to parents for its use of their personal information;
2. It will identify the purposes for which it gathers and uses personal information;
3. It will obtain consent for gathering and using and disclosing personal information;
4. It will limit collection of personal information to what is necessary;
5. It will only use, retain and disclose information for the purposes for which it was given consent, unless permitted or required by law;
6. It will ensure the accuracy of personal information;
7. It will safeguard the personal information it collects;
8. It will be open with parents about its policies regarding personal information about parents and children;
9. It will provide parents access to the personal information it collects about them and their children;
10. It will provide parents with a complaints process.

## Policy

For the purposes of this policy the word “parent” will include a parent, step-parent, guardian or any other individual legally responsible for a child; and the word “child” will include prospective, current or past student at the School or child at the Childcare Centre. “Personal Information” means information about an identifiable individual.

### **1. Accountability**

The School is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the School has appointed a Privacy Officer to ensure the School’s compliance with The Personal Information and Privacy Act and this policy.

The Privacy Officer may be contacted as follows:



The Nelson Waldorf School and Childcare Centre  
3648 Silverking Ski Hill Rd, Nelson, BC V1L 5P9  
Attention: Jamie Simon  
Phone: 250-352-6919 | Fax: 250-352-6887  
Email: [jamie.simon@nelsonwaldorf.org](mailto:jamie.simon@nelsonwaldorf.org)

## **2. Identifying What Personal Information is Collected and Why**

The School will identify the purposes for which personal information is intended to be used before or at the time it is collected.

The School collects and uses personal information to provide children with the best possible educational and care services enunciated by its Mission Statement. Most of the information the School collects comes directly from parents and children, or is information regarding the child's activities, performance or behaviour, such as attendance records or grades.

## **3. Consent**

The School will obtain consent of the parent for the collection, use or disclosure of personal information, except where the law grants permission for, or requires for collection, use, or disclosure of personal information.

This policy will be incorporated by reference in all enrolment contracts and by signing the contract parents consent to the collection and uses of information listed in this policy. Other collection, use or disclosure of personal information may require a different form of consent. In determining whether consent is required and, if so, what form of consent is appropriate, the School will take into account both the sensitivity of the personal information and the purposes for which the School 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 his/her mailing address and requests information consent to use the address to provide the requested information is implied.



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

On giving reasonable written notice to the School, an individual may withdraw consent to the collection, use or disclosure of his or her personal information. Upon notice of withdrawal of consent, the School will notify the individual of the likely consequences of withdrawing his or her consent, which may include the School being unable to continue to provide education for a child, and, except where otherwise required or permitted by law, the School will stop collecting, using or disclosing the personal information as requested.

If a person provides the School with personal information about an individual the person represents, and states that they have all necessary authority and/or has obtained all necessary consents from such individual, the School will rely on that to collect, use and disclose such personal information for the purposes set forth in this Personal Information Privacy Policy.

#### **4. Limiting Collection**

The School will limit the personal information collected to that information necessary for the purposes identified and disclosed by the School.

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

The Nelson Waldorf School and Childcare Centre will only use, disclose and retain personal information for the purpose for which it was collected, unless the individual has subsequently consented to the new use or disclosure, unless it is required or permitted by law.

Use: The School uses personal information as follows:

- to communicate with parents and children;
- to process applications;



- to provide children with the educational services/care and co-curricular programs inherent in providing quality educational experiences;
- to enable the School to carry out its administrative functions, including payment of fees and maintenance of non-educational programs including parent and volunteer participation and fundraising;
- to communicate health, psychological, or legal information, with appropriate additional consent, to provide certain specialized services in those areas, or as adjunct information in delivering educational/care services.

If, for any reason, personal information is required to fulfill another purpose, the School will, where appropriate, notify the parent/guardian and request consent before proceeding.

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

The School also collects information in connection with the use of its computer systems, online accounting software, student information system, and communication software (see Appendix 1 for links to the privacy policies of these service providers).

The Waldorf School uses anonymous information, such as information collected through surveys or statistical information regarding children, with the purpose of improving our School. This type of information is not "personal information."

Disclosure: The 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 the School may disclose personal information:

- Other educational institutions routinely contact the School for personal information about children. For example, if a child moves to another school, college or university, child records are requested by the enrolling institution. Consent to disclose information contained in report cards is implied when the child is registered at the new school. If the enquiring institution requests other information, the School will request specific consent to disclose.



- 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.

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. Child academic 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. 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 personal information to other parties.

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

**Restricting Disclosure/Sharing of Information:** If an individual chooses to limit the sharing of personal information, they should contact the School office and submit a written letter specifying which items of personal information they wish to limit, and to whom they wish these items to be restricted. Certain agencies, by law, have access to certain types of personal information and cannot be restricted.

**Retention:** 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



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.

## **6. Accuracy**

The 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.

An individual may request in writing that the school correct an error or omission in any personal information that is under its control, and the School and will, as appropriate, amend 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. If the School deems the correction requested is inappropriate (for example it reasonably believes the original information is accurate) it will make a note of the requested correction along with the information. Some personal information may be updated by the parent in the online student information system.

## **7. Safeguarding Personal Information**

The School 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. For example, teachers/educators will have access to personal information about children but not a parent's 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.



Child files are stored in secure 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. Security practices are reviewed periodically to ensure that the privacy of personal information is not compromised.

### **8. Openness**

The 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 Privacy Officer of the Nelson Waldorf School and Childcare Centre.

### **9. Individual Access to One's Own Personal Information**

The 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.

Parents may access and verify any personal information with reasonable notice so that the School is able to supply the information required. Most of this information is available in the registration forms and other forms that parents fill out either in writing or in the online student information system.

A parent may access and verify School records of their child, with reasonable notice, during normal School hours. In situations of family breakdown, the School will grant access to records of children in accordance with the law.

Students may access and verify their own school records, with appropriate notice, during normal school hours, only while accompanied by a parent. In situations of family breakdown, the school will grant access to records of students in accordance with the law.



## **10. Complaint Process**

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 using the contact information above. If necessary, individuals will be referred to use the School complaint procedure and appeals policies.

## **Appendix 1**

### **Current Online Information Storage Systems**

The School currently uses the following online accounting systems, student information systems, and communication systems:

- 1) Accounting software by Intuit - Quickbooks Online  
Intuit Canada Headquarters  
5100 Spectrum Way, Mississauga,  
ON L4W 5S2

Privacy Policy: <http://www.intuit.ca/about-intuit-canada/info/privacy-policy.jsp>

- 2) Student Information by BigSIS - Integrated Student Information System  
BigSIS:  
Mailing Address:  
PO Box 269



Boulder, CO, USA, 80306

Physical Address:

311 Mapleton Ave, #221b

Boulder, CO, USA, 80304

info@bigsis.com

#### Privacy Statement:

The Company (BigSIS, Inc.) is committed to protecting The Client's (the Nelson Area Waldorf School Association) privacy as well as the privacy of people or users who The Client adds into the BigSIS database. In keeping with that commitment, The Company warrants:

- a) that it will not resell or abuse The Client's private information;
- b) that it will not share any of The Client's information, including via website demos, without The Client's explicit written consent and that if the sharing of such information is mandated by the government, The Company will promptly advise Client of such so that Client can take any steps it believes necessary to secure its information;
- c) that it has taken proper steps to insure the security of the information provided, including on all backup sources.

#### Security Statement:

The Company will provide the hosting for the BigSIS software and database that The Client has been licensed to use. The BigSIS software and database is hosted and runs on secure servers that The Company leases from a large and reputable data center (currently Rackspace servers in northern Virginia) and all our client sites run SSL (https) for both login and data transfer. Sensitive data, such as passwords are (and in the future any HIPAA-type



data that is added will be) encrypted in the database (and therefore in backups). BigSIS does not store credit card or social security numbers. The Company agrees to perform regular security assessments on the system and keep the servers up to date with all the latest security patches. In the case of a security breach, written or electronic notice will be provided to The Client in an expedient timeframe and without unreasonable delay, unless doing so is prohibited by the government [USA] . If an employee of The Company who has access to client data leaves for any reason, The Company will take all precautions to ensure the protection of the data, including changing all passwords and locking out access to the ex-employee. The Company also strives to stay in compliance with all [USA] federal laws, such as HIPAA, COPPA and FERPA, as they apply to BigSIS.

3) Google Gsuite for Education: Gmail (.org), Drive, Docs, and Sheets

Google LLC

1600 Amphitheatre Parkway

Mountain View, CA 94043

USA

Privacy Policy: <https://www.google.ca/intl/en/policies/privacy/>

# Nelson Waldorf School