Personal Information Privacy Policy for Parents and Students

The School’s Commitment to You

Safeguarding personal information of parents and students is a fundamental concern of Heritage Christian Online School (HCOS). 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 HCOS 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.

HCOS 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 HCOS and an individual from time to time.

Ten Privacy Principles

As part of HCOS’ commitment, the Ten Privacy Principles govern the actions of the school as they relate to the use of personal information. This Personal Information Privacy Policy describes the Ten Privacy Principles and provides further details regarding HCOS’ compliance with the principles.

Definitions

In this Personal Information Privacy Policy, the following terms have the meanings set out below:

> **“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.

> **“Parent”** means the parent, guardian, or other legal representative of a student.
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> **“Student”** means a prospective, current, or past student of HCOS.
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> **“Mature Minor”** means, for the purposes of this policy, a person over the age of 14 and under the age of 19 who demonstrates the capacity to understand the information at issue and the consequences of a decision.
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> **“Privacy Breach”** means the theft or loss of, or the collection, use, or disclosure of, personal information not authorized by PIPA, including cyber and ransomware attacks and other situations where there are reasonable grounds to believe such unauthorized activity has taken place or will take place.

Principle 1 – Accountability

HCOS is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school designates (an) individual(s) who is(are) accountable for the school’s compliance with the Ten Privacy Principles. This individual is the Privacy Officer of the school.

You may contact our Privacy Officer as follows:

> **Heritage Christian Online School**
> Attn: Privacy Officer
> 905 Badke Road
> Kelowna, BC V1X 5Z5
>
> **Phone:** 1-877-862-2375
> **Fax:** 250-762-9277
> **Email:** privacy@onlineschool.ca

The Privacy Officer is responsible for: conducting privacy audits and self-assessments; developing the school’s privacy policy(ies); implementing and maintaining the privacy policy(ies); managing privacy training; responding to requests for access to and correction of personal information; and working with the BC Office of the Information and Privacy Commissioner (OIPC) in the event of an investigation. The Privacy Officer shall be familiar with PIPA and the ten principles of privacy protection.

Principle 2 – Identifying Purposes

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

What Information is Collected?

HCOS collects and uses personal information to provide students with the best possible educational services enunciated by the Mission statement of the school. 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 also includes information on academic, health, and personal matters needed by the school to provide the best possible education and co-curricular programs. HCOS 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.

In addition to educational and administrative purposes, HCOS may collect, use, and disclose personal information for investigation, disciplinary, and compliance purposes — for example, to investigate and respond to accidents, safety events, misconduct, or student conduct issues, and to ensure compliance with school policies, rules, and applicable laws.

Principle 3 – Consent

HCOS 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, HCOS will take into account both the sensitivity of the personal information and the purposes for which HCOS 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 his/her 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 HCOS, an individual may withdraw consent to the collection, use or disclosure of his or her personal information. Upon notice of withdrawal of consent, HCOS will notify the individual of the likely consequences of withdrawing his or her consent and, except where otherwise required or permitted by law, HCOS will stop collecting, using or disclosing the personal information as requested.

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

Principle 4 – Limiting Collection

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

Principle 5 – Use, Disclosure and Retention

HCOS 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.

How is Information Used?

HCOS 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 you expect.
- 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.

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.

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

When May Information be Disclosed?

HCOS 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 Heritage Christian Online School may disclose personal information.

When Authorized by You

- 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, subscriptions, video resources, etc.

Some records, however, must be disclosed to a receiving school regardless of parental preference — namely the Permanent Student Record (including documents listed as inclusions), the current Student Learning Plan (if any), and the current Individual Education Plan (if any). See the Student Records Requirements and Best Practices Policy.

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.

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, government tax reporting requirements and health authorities. 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 Third Party Service Suppliers

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

Some of HCOS's service providers, including online service providers, may store personal information using cloud services located inside or outside of Canada. HCOS conducts due diligence (such as a privacy impact assessment) to help ensure such information is secure.

Restricting Sharing Information

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.

How Long Is Personal 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.

Principle 6 – Accuracy

HCOS will take appropriate steps to ensure that personal information collected by HCOS is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used or disclosed.

How May I Update Outdated or Incorrect Information?

An individual may, upon written request to HCOS, request that HCOS correct an error or omission in any personal information that is under HCOS' control and HCOS 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.

Principle 7 – Safeguarding Personal Information

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

The School's Employees

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 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 Files

Student files are stored in secured filing cabinets and/or in digital format. Access is restricted to only those employees (teachers, teacher-aides, counselors, secretaries, etc.) who, by nature of their work, are required to see them.

Electronic Security

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.

Principle 8 – Openness

HCOS 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 HCOS.

Principle 9 – Individual Access

HCOS 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.

How May I Access My Personal Information?

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.

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.

Before releasing student personal information to a non-custodial parent, HCOS will confirm the requester's entitlement (for example, by reviewing applicable court orders). Where entitlement is unclear or there is serious conflict between parents, HCOS may seek legal counsel. The detailed procedure is set out in the Student Records Requirements and Best Practices Policy.

Student Access to Student Personal Information

A student may access and verify school records of the student, with appropriate notice during normal school hours.

Limits on Access

HCOS reserves the right to deny access to personal information or records where permitted under applicable law — for example, where disclosure could threaten someone else's safety or mental or physical health, could be harmful to the personal privacy of a third party, or would reveal personal information about other individuals.

Principle 10 – Complaint Process

Individuals may question compliance with the above principles.

Questions, Concerns and Complaints

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 calling the school office. If necessary, individuals will be referred to use the school's complaint

procedure and appeals policies.

Breach Notification

HCOS has procedures in place to address and respond to actual or suspected privacy breaches and will provide appropriate notice of any such incident as required and in accordance with applicable privacy laws. Where a breach could reasonably be expected to result in significant harm, HCOS will notify affected individuals as soon as reasonably possible and may report the breach to the BC Office of the Information and Privacy Commissioner.

Acknowledgement

At registration, parents/guardians and students (if a mature minor) will be asked to read and provide written acknowledgement that they have “read and accepted” this policy. HCOS will notify families when this policy is materially changed.

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