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## 1.0 Privacy Charter

### 1.1 Scope

This privacy policy applies to:

1. Living Waters Christian Academy employees, including contractors, students, and volunteers providing services on behalf of the Living Waters Christian Academy;
2. Any personal Information that identifies an individual, in whatever form or medium (paper, digital, audio-visual, graphic) created or received in the course of carrying out the Living Waters Christian Academy's mandated functions and activities, and;
3. All facilities and equipment required to collect, manipulate, transport, transmit, or keep Living Waters Christian Academy information.

### 1.2 Legislative Requirements

The *Personal Information Protection Act* (PIPA) ("the Act") protects the personal information of the public and employees of private sector organizations operating in Alberta. It governs the collection, use and disclosure of personal information by organizations in a manner that recognizes and balances the right of an individual to have his or her personal information protected, and the need of an organization to collect, use or disclose personal information for purposes that are reasonable.

Living Waters Christian Academy is bound by the requirements of this Act and collects, uses or discloses personal information in accordance with its provisions.

### 1.3 Privacy Principles

Living Waters Christian Academy is committed to protecting the privacy of individual employees, students and guardians. To that end, Living Waters Christian Academy has implemented a privacy program to meet the following privacy goals:

- **Accountability**

Living Waters Christian Academy is responsible for protecting the confidentiality of personal information in its custody or under its control in compliance with the applicable federal or provincial legislation.

Living Waters Christian Academy has identified and designated a Privacy Officer to be responsible for implementing the privacy program and ensuring compliance with legislation.

- **Openness**

Living Waters Christian Academy develops and follows privacy and security policies and practices that are compliant with legislation. Such policies and practices are publicly available.

- **Collection and Consent**

Living Waters Christian Academy collects personal information only for reasonable business purposes and with the consent of the individual or authorized representative, except where otherwise authorized by legislation.

- **Identifying Purposes**

Living Waters Christian Academy identifies the purposes for which personal information is collected.

- **Limited Use, Disclosure and Retention**

Living Waters Christian Academy uses, discloses and retains personal information for purposes consistent with the purpose for which it was collected. Use and disclosure for other purposes is by consent of the individual or as authorized by legislation.

- **Accuracy**

Living Waters Christian Academy makes all reasonable efforts to ensure that personal information collected, used or disclosed by or on behalf of Living Waters Christian Academy is accurate and complete.

- **Safeguards**

Living Waters Christian Academy protects personal information in its custody or control by deploying security measures and practices to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction.

- **Right of Access**

Individuals have a right to access information about them at Living Waters Christian Academy, subject only to limited and specific exceptions. Individuals who believe there is an error or omission in their personal information have a right to request correction or amendment of the information.

- **Compliance Challenges**

Individuals are encouraged to bring any concerns or issues regarding privacy at Living Waters Christian Academy to the Privacy Officer for discussion and response. Individuals may appeal to the Information and Privacy Commissioner of Alberta to review or investigate Living Waters Christian Academy right of access or correction responses, or any policies or practices that they feel are not in compliance with legislative requirements.

## 2.0 Terms and Definitions

### **Authorized representative:**

May include:

- A guardian of a minor
- An executor or administrator of the estate of an individual who is deceased.
- A guardian or trustee of a dependent adult
- An individual acting with the written authorization of an individual.
- An individual who is acting under a power of attorney.

### **Collection:**

To gather, acquire or obtain personal information from any source, including third parties.

### **Consent:**

A voluntary agreement that allows the collection, use and disclosure of personal information by Living Waters Christian Academy for a defined purpose. Consent may be explicit, implied or opt-out and may be revoked at any time (see section 1.8 “consent standards”).

### **Disclosure:**

Giving access to or making the personal information in the school’s custody available by other means, to a third party such as another person, organization or a contractor.

### **Employee**

An individual employed by Living Waters Christian Academy. Under the Act, an individual who is an apprentice, volunteer, participant, student or who is under a contract or agency relationship is also considered an “employee.”

### **Health Information**

Personal information about the physical or mental health of someone, including the administration of drugs or the use of health care aids.

### **Notification:**

An explanation of policies, procedures, consequences and risks related to the collection, use or disclosure of an individual’s personal or personal employee information. Living Waters Christian Academy must properly inform and notify individuals and employees that personal information is being collected, and the purposes for which it is being collected.

### **Personal Employee Information**

Personal information collected, used, or disclosed solely for the purposes of establishing, managing or terminating an employment or volunteer relationship.

### **Personal Information**

Information about an identifiable individual, including factual information and opinions expressed about and by the individual, including, but not limited to:

- Name, address, age, gender, weight and height
- Educational or financial history
- ID numbers, place of birth, ethnic origin
- Medical information
- Opinions and evaluations of or about an individual
- Religious, political or civil affiliations, where applicable
- Consumer activity

Personal information does not include

- Business title, address or telephone number of an individual
- Information collected for artistic or literary purposes
- Personal employee information

**Third Party**

Organization or person other than the students, parents, employees and officials in Living Waters Christian Academy involved in the transaction.

**Use**

Use of information by Living Waters Christian Academy employees for an identified business purpose that is authorized by policy or law.

## 3.0 Collection, Use and Disclosure of Personal Information

### 3.1 Collection of Personal Information

1. The least amount of information is collected, with the highest degree of anonymity, to meet only a reasonable business purpose. The purposes for collection may include:
  - Assessing student eligibility for enrolment
  - Offering educational services, programs and activities
  - Providing learning or behavioral assessments
  - Offering personal counseling
  - Ensuring student health and safety
  - Allowing participation in special events, including sporting events and travel
  - Enabling liaison with student families, including home-stays
  - Promoting enrolment development
  - Fundraising, including product sales and special events
  - Finance administration
  - Arranging for and processing of tuition payments
  - Arranging for contracting services

For further details about the purposes for the collection, use or disclosure of personal information, please refer to [Appendix 1](#).

2. Living Waters Christian Academy collects personal information with the consent of the individual using the Consent Form and in accordance with consent standards (see [Section 5.0](#)).
3. Personal information that is *not* health information is deemed to have been collected with appropriate consent and notification if it was collected before January 1, 2004.
4. The Living Waters Christian Academy collects personal information about individuals directly from the student, parents or other authorized representative.
5. Health and other personal information can be collected without the consent of the individual for the following purposes:
  - it is clearly in the best interests of the individual and consent cannot be obtained in a time period required for the purpose.
  - to conduct an investigation of a breach of law or agreement or for a legal proceeding
  - to deal with an emergency that threatens the life, health or security of an individual;
  - to comply with a subpoena or warrant;
  - to collect a debt owed by the individual to Living Waters Christian Academy;
  - for archival or research purposes that cannot be achieved without using identifiable information;
6. Personal information other than health information can be collected without the consent of the individual for the following additional purposes:
  - if the collection is authorized by statute or regulation (e.g., School Act);
  - to support legal counsel in order to represent Living Waters Christian Academy;
  - to contact next of kin or friend of an individual who is deceased, ill, or injured;
  - to determine the individual's suitability to receive an honour, award or similar benefit, including an honorary degree, scholarship or bursary;

### 3.2 Use and Disclosure of Personal Information

7. Living Waters Christian Academy uses and discloses personal information only for the purposes consistent with those identified at the time of collection or according to purposes listed in section 3.1. All uses and disclosures for other purposes require the consent of the individual in accordance with consent standards (see [Section 5.0](#)).
8. However, no consent is required for disclosure of both health and personal information, regardless of the purposes for which it was collected, in the following circumstances:

- to government agencies, or investigative bodies with the authority to administer or enforce a law of Canada, or to investigate a threat to national defense, security, or international affairs;
  - to comply with a statute or regulation;
9. In addition, personal information other than health information can be disclosed without the consent of the individual to a surviving spouse, partner or relative of a deceased individual if the disclosure is reasonable.
  10. Living Waters Christian Academy will ensure that the student or authorized representative is notified of any new purpose for which personal information will be used or disclosed.

### **3.3 Notification Requirements**

1. Living Waters Christian Academy ensures that the individual is properly notified of the purposes for collecting, using or disclosing their personal information before the information transaction takes place, unless it is for one of the purposes for which consent is not required.
2. Living Waters Christian Academy ensures individuals are notified of any surveillance devices in use on the premises for security purposes.
3. Living Waters Christian Academy notifies individuals through the use of appropriate notices, forms, posters, verbal statements, brochures, or other forms of communication.

## 4.0 Collection, Use and Disclosure of Personal Employee Information

### 4.1 Collection of Personal Employee Information

1. The least amount of information is collected, with the highest degree of anonymity, to meet the business purpose.
2. Personal employee information collected must be limited to that required to support the work or relationship the employee has with Living Waters Christian Academy. The purposes for collection of personal employee information may include:
  - Enabling professional development
  - Ensuring employee health and safety
  - Managing School Finances
  - Processing of salary payments
  - Obtaining contract services
  - Human resources administration
  - Evaluation of staff / performance appraisals
  - Employee recruitment, classification and compensation
  - Occupational health and employee benefits administration

For specific information about the purposes for the collection, use or disclosure of personal employee information, please refer to [Appendix 2](#) which identifies the purposes of collection in further detail.

3. Consent is not required when personal information is collected for the purposes of recruiting potential employees, managing an existing employee, or terminating an employee. For all other purposes, the Living Waters Christian Academy will obtain the consent of the individual using the Consent Form to authorize the collection of personal employee information and in accordance with consent standards (see [Section 5.0](#)).
4. Personal information that is *not* health information is deemed to have been collected with appropriate consent and notification if it was collected before January 1, 2004.

### 4.2 Use and Disclosure of Personal Employee Information

1. Living Waters Christian Academy uses and discloses personal employee information of existing or past employees only for the purposes of recruiting potential employees or for reasonable employee management purposes identified in 4.1.
2. For all other purposes, the Living Waters Christian Academy will obtain the consent of the individual using the Consent Form to authorize the use and disclosure of personal employee information and in accordance with consent standards (see [Section 5.0](#)).

### 4.3 Notification Requirements

1. Whether or not consent is required, all potential, existing, and past employees will be notified of the purposes for which their personal employee information is collected, used, and disclosed before the information transaction takes place.
2. Living Waters Christian Academy notifies individuals through the use of appropriate notices, forms, posters, verbal statements, brochures, or other forms of communication.

## 5.0 Consent Standards for Personal Information

1. An individual consents when they make a voluntary and informed agreement with Living Waters Christian Academy for collecting, using and disclosing their personal information for a specific purpose.
2. Living Waters Christian Academy will obtain the consent before collecting the information. If additional consent is required for use and disclosure Living Waters Christian Academy will obtain consent before the use or disclosure occurs.
3. There are three options for determining the appropriate consent forms or process:

Explicit consent:

Individual is properly informed and explicitly gives permission, either in writing or orally, before action is taken.

Implied or deemed consent:

Permission is reasonably implied based on clear and direct actions and circumstances under which the information was provided. For example, a when a person provides a personal cheque that includes an account number to pay tuition, the consent is implied to use it for that purpose only.

Opt-out

An individual is given reasonable opportunity to express their wishes; if no response is given, consent is assumed.

4. Explicit or implied consent is required for all personal information, unless specifically authorized in policy. Opt-out is only used when dealing with personal information limited to name and location or contact information.
5. Only the individual or authorized representative can provide consent.
6. Living Waters Christian Academy cannot refuse a service to an individual if they refuse to give their consent for the collection of personal information beyond what is reasonably required to provide the service.
7. An individual may refuse to give their consent for personal information to be collected in relation to a specific purpose Living Waters Christian Academy has identified. In the event that an individual places reasonable conditions on their consent, the Living Waters Christian Academy must consider whether there is another way the purpose may be achieved without collecting the information.
8. An individual may revoke consent at any time.

## 6.0 Information Handling and Security

The information security provisions of the *Personal Information Protection Act* (“the Act”) requires Living Waters Christian Academy to protect personal information in its custody or control by making reasonable security arrangements to protect against unauthorized access, collection, use, disclosure or destruction. This policy outlines administrative, technical and physical safeguards to protect confidential personal information.

### 6.1 Administrative Safeguards

1. Living Waters Christian Academy ensures those policies and procedures to facilitate the safeguarding of confidential information in its custody or control are developed and maintained.
2. The need for confidentiality and security of personal information is addressed as part of the conditions of employment for Living Waters Christian Academy employees, beginning with the recruitment stage, and included as part of job descriptions and contracts. All staff must be aware of, and appropriately trained with regard to, policies and procedures for safeguarding information.
3. All Living Waters Christian Academy employees, volunteers, and contracted personnel that collect, use, disclose or have access to confidential information as part of the performance of their duties for Living Waters Christian Academy sign a Confidentiality Agreement ([Appendix 7](#)).
4. Before implementing proposed new administrative practices or information systems that will change or significantly affect the collection, use and disclosure of personal information, Living Waters Christian Academy completes an assessment that describes how the new initiative will affect privacy, and what measures Living Waters Christian Academy will put in place to mitigate risks to privacy.
5. Living Waters Christian Academy employees and persons acting on behalf of Living Waters Christian Academy report all violations and breaches of information security as soon as possible to Living Waters Christian Academy’s Privacy Officer. This enables the Privacy Officer to take corrective action to resolve the immediate problem and minimize the risk of future occurrence.

### 6.2 Physical Safeguards

1. All Living Waters Christian Academy records, both on-site and off-site, are held and stored in an organized, safe and secure manner in accordance with information security standards.
2. Appropriate fire detection and extinguishing devices are located in areas where personal information is stored.
3. Living Waters Christian Academy’s records are not accessible by unauthorized persons. In areas where unauthorized persons are present, measures will be taken to ensure that files are not left unattended or accessible;
4. Computers or monitors that are left unattended in reception areas or areas where personal information is processed are secured and logged off, either manually or by default timer.
5. All servers and equipment storing electronic personal information are secured by locked cabinets or rooms within Living Waters Christian Academy when not under direct supervision by staff.
6. Living Waters Christian Academy records or equipment holding records (e.g. laptop computers) may not be left unattended in a vehicle, even if the vehicle is locked.
7. Appropriate measures are taken to control the distribution of keys or pass codes, and to ensure they are returned or changed after employment or association with the Living Waters Christian Academy has ended.
8. Confidential information will be treated with sensitivity. Staff will take care when sharing information if conversations can be overheard or intercepted by unauthorized individuals.
9. Confidential, restricted, or sensitive information that is transmitted by mail or courier will be sealed, marked as confidential, and directed to the attention of the authorized recipient.

10. Living Waters Christian Academy employees will verify the identity and credentials of courier services used for the transportation of personal information.
11. Fax machines and printers that may be used to send or receive confidential information are located in a secure area. All fax transmissions will be sent with a cover sheet that indicates the information being sent is confidential ([Appendix 5](#)). Reasonable steps are taken to confirm that confidential information transmitted via fax is sent to a recipient with a secure fax machine.
12. Confidential or sensitive information is destroyed by shredding. Destruction will be documented by listing the records and / or files to be destroyed, the date of destruction, and a staff member's signature to confirm that the destruction occurred.
13. All information will be deleted using secure data wiping techniques prior to disposal of electronic data storage devices (e.g. surplus computers, internal and external hard drives, diskettes, tapes, CD-ROMS, etc.), or the device(s) will be destroyed.
14. Student records, in any format (hard copy or electronic), will be retained in compliance with the *School Act*. The retention period for all other personal information is set according to the business requirements of Living Waters Christian Academy. Personal information that was used to make a decision about an individual will be kept for at least one year after the decision has been made.

### 6.3 Technical Safeguards

1. Firewalls, intrusion detection software, or other technical means to protect internal Living Waters Christian Academy networks carrying identifiable personal information is in place to prevent unauthorized use and malicious software.
2. Access to data and application systems to personal information is limited by each Living Waters Christian Academy's employee functional role and need to know.
3. Employees of Living Waters Christian Academy access and use information systems under their assigned User ID. The use of another person's assigned User ID is prohibited.
4. Access to Living Waters Christian Academy information systems is controlled and password protected. Passwords are kept confidential at all times and will not be written down, posted publicly, or shared with other staff. Passwords will be changed on a regular schedule. If a computer is left unattended, it will be protected against unauthorized access by manual logout requiring authentication to re-enter the system.
5. Personal information is not permitted to be sent by e-mail or transmitted over the internet or external networks without the use of appropriate security safeguards, such as encryption and authentication. E-mail messages must also contain a confidentiality notification (see [Appendix 6](#)).
6. To detect unauthorized access and prevent modification or misuse of user data in applications, systems may be monitored to ensure conformity to access policies and standards. Appropriate security controls, such as event logs, will be implemented and reviewed as required.
7. Computer systems that hold critical or sensitive information will be backed up on a daily basis. Backed up information is stored in a secure environment off-site. Information that is intended for long-term storage on electronic media (e.g. tape, DVD, disk) will be reviewed on an annual basis to ensure the data is retrievable, and to migrate the data to another storage medium if necessary.

## 6.4 Contractors

1. Living Waters Christian Academy ensures contracted service providers (e.g. contractors, consultants, support service providers or business partners) comply with Living Waters Christian Academy's privacy and security policies.
2. An agreement or contract is completed and signed between Living Waters Christian Academy and all contracted service providers that require access to the information systems and assets of Living Waters Christian Academy.
3. Until a contract detailing explicit information security provisions has been executed, the contracted service provider is not given access to premises or systems containing confidential business or personal information of Living Waters Christian Academy.
4. Information security provisions outlined in contracts with contracted service providers meet or exceed the standards set out in the information security policies and procedures. Any related contracted service provider information security and privacy policies should be made available to Living Waters Christian Academy upon request, including any updates or revisions that occur after execution of the contract.
5. All employees of contracted service providers who have exposure to and use Living Waters Christian Academy information assets and systems sign a confidentiality (non-disclosure) agreement ([Appendix 7](#)). Contracted service provider service providers should remind their employees on termination of their continued responsibility to maintain the confidentiality of Living Waters Christian Academy information.
6. Contracted service providers immediately report breaches of confidentiality and privacy to Living Waters Christian Academy Privacy Officer.
7. Contracts with service providers that have access to Living Waters Christian Academy information assets and systems include provisions that protect Living Waters Christian Academy operations from circumstances where the information assets or systems may be compromised. In order to mitigate these situations, disaster recovery and system backup included in all agreements, to a standard that meets or exceeds that of Living Waters Christian Academy.
8. Contracts with service providers include provisions for destroying or returning all Living Waters Christian Academy information assets, including hardware, system documentation and information assets upon termination of agreements and in accordance with contract provisions reflecting records retention and data management policy.
9. To ensure compliance with contracted provisions for information security, Living Waters Christian Academy:
  - requests contractors sign an acknowledgement that they have received, read and will comply with any Living Waters Christian Academy information security policies they are bound to follow under contract;
  - actively monitors contracted service providers with access to information assets or systems for inappropriate access or use and to ensure compliance with contract security provisions.
10. Living Waters Christian Academy retains the right to inspect the premises and security practices of contracted service provider without notice to ensure compliance with contract provisions and stated policies.

## **7.0 Right of Access and Correction**

Subject to limited and specific exceptions, individuals have a right of access to information about themselves that is in the custody or control of the Living Waters Christian Academy. Further, individuals have a right to request correction or amendment of information about themselves. This policy is intended to define a process for facilitating requests for access to personal information, or to correct or amend personal information.

### **7.1 Individual Requests for Access to Their Own Information**

1. Requests from individuals to access basic personal information about themselves (e.g., contact information, dates and times) are handled as a routine release of information.
2. Formal requests for access to information that may involve review and severing must be in writing to the Living Waters Christian Academy Privacy Officer, or designate. An individual may request access to another person's information only if they have signed consent of the person or if they can prove they are the person's legal representatives.
3. Individuals making routine or formal requests may be required to provide sufficient information to verify their identity and authorize access to the information. Any such information provided shall be used for these purposes only.
4. Living Waters Christian Academy responds to formal requests for access to personal information within forty-five (45) calendar days of receipt of the request and within thirty (30) calendar days for requests for health information.
5. Living Waters Christian Academy does not charge the individuals for access to their own personal information. However, reasonable fees may be charged for reproduction, transcription, or transmission of information, so long as the individual is notified before these costs are incurred. A fee for reasonable costs incurred may be charged when responding to more complex requests. The individual will be informed of the fee in advance.
6. Requested information will be provided in a form that is generally understandable. Living Waters Christian Academy will endeavor to explain the meaning of the content, codes and abbreviations included in the individual's record to the extent that it is reasonably practical.
7. In providing an account of third parties to whom it has disclosed personal information about an individual, Living Waters Christian Academy will be as specific as possible. When it is not possible to provide a list of the organizations to which it has actually disclosed information about an individual, Living Waters Christian Academy will provide a list of organizations to which it is likely to have disclosed information.
8. Individuals are permitted to view either the original record, or to request a copy of the record, subject to exceptions under the Act. To preserve the integrity of the record and ensure that documents are not removed from Living Waters Christian Academy, an individual wishing to view an original record will do so under the supervision of designated Living Waters Christian Academy personnel.

### **7.2 Exceptions to Right of Access**

1. In certain situations, Living Waters Christian Academy may not be able to provide access to all the personal information it holds about an individual. Living Waters Christian Academy must refuse to provide access to information:
  - when it is about a third party or reveals the identity of a third party providing an opinion about an individual, unless the third party consents to the access;
  - if access could reasonably be expected to threaten the life or security of another individual.

2. Additionally, Living Waters Christian Academy may refuse to provide access to information:
  - that is protected by solicitor-client privilege;
  - that would reveal confidential commercial information;
  - that was collected without the individual's knowledge or consent as part of an investigation of a breach of agreement or contravention of law;
  - that was generated in the course of a formal arbitration or mediation process;
  - that is about disclosures of information to comply with a warrant or subpoena.
3. In the event Living Waters Christian Academy refuses to provide access to information, the excepted information are appropriately severed from the record before providing it to the individual.
4. Living Waters Christian Academy informs the individual in writing of the refusal or acceptance of the request, the reason(s) for the refusal, and any recourse the individual may have to challenge Living Waters Christian Academy's decision.

### **7.3 Individual Requests to Correct or Amend Personal Information**

1. Requests from individuals to correct / amend information about themselves (e.g. change of name or address) are handled as a routine correction of information.
2. Formal requests to correct or amend information subject to review must be in writing to the Living Waters Christian Academy Privacy Officer, or designate. An individual may request the correction of another person's information only if they have that person's signed consent or they can prove they are the person's legal representative.
3. All formal requests must be accompanied by appropriate documentation to support their request before Living Waters Christian Academy will amend the information as required and as appropriate. Generally, Living Waters Christian Academy will not amend professional opinions that are made by staff that have the competency to make them. If amendments are made, the original information must not be deleted but retained and marked as incorrect by crossing out, for example. The amended information will be transmitted to third parties, as appropriate.
4. Living Waters Christian Academy responds to formal requests for correction of personal information within forty-five (45) calendar days of receipt of the request and within thirty (30) days for requests involving health information.
5. Living Waters Christian Academy informs the individual in writing of the refusal or acceptance of the request, the reason(s) for the refusal, and any recourse the individual may have to challenge Living Waters Christian Academy's decision.
6. If the individual is not satisfied with the results of his/her request, Living Waters Christian Academy internally documents the issue in the relevant record(s) and provides a response. The existence of the unresolved challenge will be transmitted to third parties, as appropriate.

### **7.4 Individual Challenges to Request Responses**

Individuals are encouraged to bring any concerns or issues concerning responses to requests and compliance with this policy to Living Waters' Privacy Officer for discussion and mediation. Individuals may also challenge responses in writing to the Information and Privacy Commissioner of Alberta or, in the case of health information, the Privacy Commissioner of Canada.

## **8.0 Roles and Responsibilities**

Under the *Personal Information Protection Act* (PIPA) and the *Personal Information Protection and Electronic Documents Act* (PIPEDA) Living Waters Christian Academy is required to identify a contact person who is responsible for ensuring compliance with applicable privacy legislation. This policy is intended to define accountabilities for privacy compliance within the Living Waters Christian Academy.

### **8.1 Privacy Officer Responsibilities**

The administrator or designate, is designated to act as Privacy Officer for the Living Waters Christian Academy.

The responsibilities of the Privacy Officer include:

1. identifying privacy compliance issues for Living Waters Christian Academy ;
2. ensuring that privacy and security policies and procedures are developed and maintained as necessary;
3. ensuring that Living Waters Christian Academy employees, volunteers and contracted personnel are aware of their duties, roles, and responsibilities under applicable privacy legislation;
4. consultation with Living Waters Christian Academy employees as necessary, providing advice on, and interpretation of, applicable privacy legislation, including release / non-release of information;
5. responding to requests for access to information, or to correct or amend personal information, and facilitating the request process as necessary
6. ensuring the overall security and protection of personal information in the custody or control of the Living Waters Christian Academy ;
7. representing Living Waters Christian Academy in dealings with third parties, the provincial government, and the Commissioner, as necessary.

### **8.2 School Board**

The Board of Directors of Living Waters Christian Academy review and approve Privacy policy.

### **8.3 All Staff**

All staff are responsible for implementing privacy for all information they may collect, use, disclose, handle, or view. Staff members:

1. make themselves aware of and adhere to access to information and privacy policies and standards;
2. access, release and protect information in their custody or control according to policy;
3. refer to the Privacy Officer all decisions about collection, use, disclosure, and access that are not clearly directed by policy.

## 9.0 Appendices

### 9.1 Appendix 1: Business Purposes for Personal Information

The following types of personal information may be collected for the corresponding business purposes. These purposes may be identified and applied as necessary to consents for collection, use, or disclosure and to notification documents.

• <b>Business Purpose</b>	• <b>Personal Information</b>
<p style="text-align: center;"><b>Eligibility and pre-assessment</b></p> <ul style="list-style-type: none"> <li>• Assessing Parent/Student Eligibility</li> <li>• Determining eligibility for Tuition Assistance</li> <li>• Verification of Financial status</li> <li>• Set-up of Pre-authorized Payment Plan</li> <li>• Credit check</li> <li>• Issue of Identification cards including photograph</li> </ul>	<ul style="list-style-type: none"> <li>• Communication between public schools and the private schools.</li> <li>• Social Services</li> <li>• Letter of reference from third-parties</li> <li>• Application and Interview Forms</li> <li>• Notes from conversations with referee</li> <li>• Church Connections/experiences/pastoral reference</li> <li>• Means testing</li> <li>• Portfolio assessment</li> <li>• Psychological assessments</li> <li>• Educational information (report cards, permanent record)</li> <li>• Transfer form (<i>School Act</i> authorizes)</li> </ul>
<p style="text-align: center;"><b>Learning assessments</b></p> <ul style="list-style-type: none"> <li>• Achievement testing</li> <li>• Issue of Report cards</li> <li>• Portfolio Assessments</li> </ul>	<ul style="list-style-type: none"> <li>• Behaviour / psychological inventory</li> <li>• Student health initiatives</li> <li>• Consultants (in-house or third-party)</li> <li>• Parent teacher interviews</li> <li>• Reports by professionals including teachers</li> <li>• Speech and language reports</li> <li>• Recording information on videotape</li> </ul>
<p style="text-align: center;"><b>Student counseling</b></p> <ul style="list-style-type: none"> <li>• Provision of counseling services</li> <li>• Referral for counseling services</li> </ul>	<ul style="list-style-type: none"> <li>• Counseling request forms including brief description of reason, including disciplinary incidents, or concerns about behaviour or learning issues</li> <li>• Application assistance to post-secondary institutions (sometimes includes letter of reference)</li> <li>• Aptitude and personality assessments</li> <li>• Indirect investigations – student discipline, missed homework assignments</li> <li>• Reports by professionals including teachers</li> <li>• Student Health Initiatives or by the school itself</li> </ul>

<ul style="list-style-type: none"> <li>• <b>Business Purpose</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Personal Information</b></li> </ul>
<p style="text-align: center;"><b>Student health and safety</b></p> <ul style="list-style-type: none"> <li>• To receive vaccination or immunization</li> <li>• Psychiatric or social worker counseling</li> <li>• Student Health Initiatives</li> <li>• To supply appropriate provisions for special needs students</li> <li>• Responding to emergency or crisis situations</li> <li>• Fulfilling legal reporting requirements (i.e. law enforcement or mental health board).</li> <li>• Surveillance of premises to safeguard against vandalism or theft</li> </ul>	<ul style="list-style-type: none"> <li>• Application or interview form</li> <li>• Reports results (i.e. speech and language reports).</li> <li>• Health release forms for travel or emergency situations at the school</li> <li>• Videotape or other recording device</li> </ul>
<p style="text-align: center;"><b>Special Events</b></p> <ul style="list-style-type: none"> <li>• Participation in sporting or other events</li> <li>• Making travel arrangements for National or International Travel</li> </ul>	<ul style="list-style-type: none"> <li>• Travel agents</li> <li>• Chaperones</li> <li>• Volunteer or parent drivers</li> </ul>
<p style="text-align: center;"><b>Student / Family liaison</b></p> <ul style="list-style-type: none"> <li>• Conducting Student / teacher / parent / interviews</li> <li>• Arranging Home-stays (exchange students) or foster children Contact information</li> <li>• Responding to emergency or crisis situations</li> <li>• Awareness of family status (e.g. Divorce / custody situations)</li> <li>• Publishing of Parent directories</li> <li>• Publishing of Class listings</li> </ul>	<ul style="list-style-type: none"> <li>• Application or interview form</li> <li>• Student grades/test results</li> </ul>
<p style="text-align: center;"><b>Development</b></p> <ul style="list-style-type: none"> <li>• Implementing marketing initiatives</li> <li>• Honour roll / achievement award announcements</li> </ul>	<ul style="list-style-type: none"> <li>• School Newsletters / papers</li> <li>• Parent teacher interviews</li> <li>• Brochures</li> <li>• Recording list of individuals who have shown interest in the school</li> <li>• Donor lists</li> <li>• Alumni listings</li> </ul>
<p style="text-align: center;"><b>Fundraising</b></p> <ul style="list-style-type: none"> <li>• To cultivate awareness and relationship with individuals and the community</li> <li>• Product sales</li> </ul>	<ul style="list-style-type: none"> <li>• Participant information</li> <li>• Estate information</li> <li>• Charitable donations</li> <li>• Credit card information</li> <li>• Bank account information</li> <li>• Record of purchase history (cultivation of donors (e.g. demographic information).</li> </ul>
<p style="text-align: center;"><b>Finance Administration</b></p> <ul style="list-style-type: none"> <li>• Payment of Tuition</li> <li>• Bursary administration</li> </ul>	<ul style="list-style-type: none"> <li>• Payment type (i.e. deferred payment)</li> <li>• Bank Account Information</li> <li>• Application for bursary including financial information</li> </ul>

## 9.2 Appendix 2: Business Purposes for Personal Employee Information

Living Waters Christian Academy collects, uses, and discloses personal employee information for reasonable purposes relating to employee recruitment or management. The purposes and information identified below may be used as appropriate in required personal employee consents and notifications.

• <b>Business Purpose</b>	• <b>Personal Employee Information</b>
<p style="text-align: center;"><b>Special Events</b></p> <ul style="list-style-type: none"> <li>• Acting as chaperone or driver for sporting or other events</li> <li>• Making travel arrangements for National or International Travel</li> </ul>	<ul style="list-style-type: none"> <li>• Driver's abstracts</li> <li>• Insurer</li> <li>• Criminal record check results</li> <li>• Social Services check</li> <li>• Passport information</li> </ul>
<p style="text-align: center;"><b>Finance Administration</b></p> <ul style="list-style-type: none"> <li>• Arranging for and processing payment of salary</li> <li>• Arranging for contracting services</li> </ul>	<ul style="list-style-type: none"> <li>• Bank account information</li> <li>• Wage garnishees</li> </ul>
<p style="text-align: center;"><b>Legislated requirements</b></p> <ul style="list-style-type: none"> <li>• Reporting to law enforcement, mental health board, etc.</li> <li>• Reporting to federal government in accordance to employment legislation</li> </ul>	<ul style="list-style-type: none"> <li>• Federal or provincial government agencies or departments, regulatory or law enforcement bodies</li> </ul>
<p style="text-align: center;"><b>Human Resources</b></p> <ul style="list-style-type: none"> <li>• Staff recruitment, classification, compensation</li> <li>• Maintaining staff employee files / databases / personal inventories (Myers-Briggs, etc)</li> <li>• Succession planning</li> </ul>	<ul style="list-style-type: none"> <li>• Criminal Records Check results</li> <li>• Employment reference checks</li> <li>• Salary verification to third parties upon request of employee</li> <li>• Resumes, applications, letter of hire, and interview notes</li> </ul>
<p style="text-align: center;"><b>Staff evaluation</b></p> <ul style="list-style-type: none"> <li>• Preparation and delivery of performance appraisals</li> <li>• Administrative investigations</li> </ul>	<ul style="list-style-type: none"> <li>• Living Waters Christian Academy Employees, on a need to know basis</li> </ul>
<p style="text-align: center;"><b>Contracting</b></p> <ul style="list-style-type: none"> <li>• Hiring of outside agents and consultants (e.g. health care providers, travel agents, piano teachers, book-keeping services, legal services etc.)</li> <li>• Recruitment of On-Line Instructors</li> </ul>	<ul style="list-style-type: none"> <li>• Application or interview forms</li> <li>• Criminal record check results</li> <li>• Employment reference checks</li> </ul>
<p style="text-align: center;"><b>Employee Benefits</b></p> <ul style="list-style-type: none"> <li>• Registration requirements for enrolment and participation in Employee Assistance and Benefit Programs</li> </ul>	<ul style="list-style-type: none"> <li>• Beneficiary information (next of kin)</li> <li>• Health information</li> <li>• Pension information</li> <li>• Absence information</li> </ul>
<p style="text-align: center;"><b>Employee Health and safety</b></p> <ul style="list-style-type: none"> <li>• Assisting qualified employees with long term/ short term disability benefits</li> <li>• Psychiatric or social worker counseling</li> <li>• Responding to emergency or crisis situations</li> <li>• Fulfilling legal reporting requirements (i.e. law enforcement or mental health board).</li> <li>• Surveillance of premises to safeguard against vandalism or theft</li> </ul>	<ul style="list-style-type: none"> <li>• Application or interview form</li> <li>• Health release forms for travel or emergency situations at the school</li> <li>• Medical information</li> <li>• Absence information</li> <li>• Videotape or other recording device</li> </ul>

<p style="text-align: center;"><b>Managing personnel</b></p> <ul style="list-style-type: none"><li>• Recognition of employee achievement</li><li>• Succession planning</li><li>• Implementing personal professional growth plan mandated by Alberta Learning</li><li>• Approval and enrolment in professional development courses</li><li>• Responding to requirement for provincial government grant information</li><li>• Conducting administrative investigations</li></ul>	<ul style="list-style-type: none"><li>• Performance appraisal results</li><li>• Application and interview forms</li><li>• Achievement award announcements</li><li>• School Newsletters/papers</li></ul>
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## **9.3 Appendix 5: Security of Facsimile and Electronic mail Transmissions**

### **9.3.1 All Transmissions**

1. Limit transmission to circumstances where it is immediately necessary for time-sensitive or functional reasons and to the least amount of information possible.
2. All transmissions must be accompanied by the following statement:  
*This information is intended for the identified recipient only and may contain information that is privileged or confidential under law. If you are not the intended recipient, you are hereby notified that any dissemination or communication of this information is strictly prohibited. If you have received this communication in error, please notify the sender immediately at the contact address or number indicated.*
3. Living Waters Christian Academy users will only send or forward very large documents or attachments when absolutely necessary.
4. Living Waters Christian Academy will protect spooled data awaiting output to a level consistent with its sensitivity. Only those authorized should see the data spooled.

### **9.3.2 Electronic mail**

1. Employees shall take steps to ensure that their email is secured and limit sensitive email to the school authorized system.
2. Remove all personal identifiers from the message if possible.
3. Do not transmit identifiable personal information by e-mail to an external or public zone unless the information is secured by encryption.
4. Do not include identifiers or personal information in the subject header of the mail.
5. Verify all addresses as correct before sending messages.
6. Develop, update and use e-mail addresses from address book.
7. Request notification of receipt.
8. Living Waters Christian Academy users will not open e-mail message attachments from suspicious or doubtful sources. If in doubt, contact the sender and verify the content of the message.

### **9.3.3 Facsimile transmissions**

1. The recipient's machine must be in a secure area. Otherwise, the recipient should stand by to receive and confirm transmission of the information. Where information is routinely sent by batched fax transmission, the responsibility to confirm secure receipt of the information lies with the sender.
2. An approved Living Waters Christian Academy Fax Transmission Cover Sheet must be completed and accompany the information transmitted.
3. To ensure accuracy in dialing, confirm the number being dialed by visual check on the fax machine display. For frequently dialed numbers, use the automatic dialing feature to minimize incorrect dialing.
4. For automatic faxing by computer, use a fax table for automatic dialing of numbers.
5. Where possible, use available security features on the fax machine, i.e. confidential mailboxes to ensure the confidentiality of information.
6. Print out and check the fax machine logs after transmission to verify that documents were received at the correct number.
7. If it is determined that the transmission was received by a wrong number:
  - contact the recipient and ask them to return or destroy the documents,
  - retain copies of all information sent, and
  - report the incident as an information security breach to the Living Waters Christian Academy's Privacy Officer.

### **9.3.4 Inspections of E-mail Messages**

1. Living Waters Christian Academy may view, monitor or inspect any messages sent or received using the Living Waters Christian Academy system in order to:
  - investigate information security incidents
  - support an urgent, time-sensitive action
  - maintain Living Waters Christian Academy information systems
  - comply with a court order or statutory requirement
2. Where access to e-mail is deemed necessary, Living Waters Christian Academy will attempt to inform the affected users prior to any inspection or disclosure of e-mail records, except when such notification would be detrimental to an investigation of possible violation of the Act or Living Waters Christian Academy policy.

### **9.3.5 Filing and Retention of E-mail messages**

1. E-mail messages are considered records and therefore subject to the standards for classification and retention in the School Act. Messages that must be retained as master records should be either:
  - Email should be backed up using an automatic back up system.
  - Email records for employees no longer employed shall be archived for 5 years.