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### **LHCS Statement of Purpose**

We believe it is our responsibility as Christians to raise children in the light of God's Word. The education of children must be Christ-centered, equipping them to become responsive disciples of Christ who seek the will of the Lord in all aspects of life.

### **LHCS Mission Statement**

Kitchener-Waterloo Christian School Society advances dynamic, excellent Christ-centered education through unconstrained facilities, exceptional programs, and extensive resources that cultivate responsive disciples of Christ.

### **LHCS Vision Statement**

As a diverse community, Kitchener Waterloo Christian School Society intentionally engages God's world, locally and globally, through distinctive educational programming, strategic partnerships and sustainable growth.

Effective Date: **March, 2006**

Review Date: **Annually**

Revision Date(s):

Committee: **Board of Directors**

## **Policy 104 – Employee and Volunteer Privacy Policy**

### **Policy Statement**

Safeguarding the personal information of employees and volunteers is a primary concern of Laurentian Hills Christian School. 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 for Christian school communities to respect the dignity of individuals, including the appropriate collection, use, and storage of personal information.

This policy details the policies and practices of LHCS Christian School regarding the collection, use, and disclosure of personal information about employees and volunteers. This policy 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 policy, "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.

Although Ontario has no specific privacy legislation as yet (November 2006), for purposes of this policy it is useful to consider the following definition of "employee personal information" as defined in British Columbia law: "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.

## **Accountability**

At LHCS Christian School the COO or designate is the Privacy Officer responsible for implementing the privacy policy for employees and volunteers.

## **2. Identifying purposes**

### **A. Employees**

LHCS Christian School 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;
- 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**

LHCS Christian School 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.
- 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 Web sites;
- 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;
- 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. LHCS Christian school will take into account the sensitivity and intended use of personal information and where appropriate require consent to be expressed, or implied, or deemed.

#### **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: LHCS Christian school 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 by law.**

Third parties may include but is not limited to:

- 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).

LHCS Christian School 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 LHCS Christian School 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.

#### **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**

LHCS Christian School will readily make available its policies and practices regarding the protection of personal information.

**9. Individual access**

LHCS Christian School 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.