

BC School Trustees Association Personal Information Protection Policy

I. Our Commitment to Privacy

The British Columbia School Trustees Association (BCSTA) recognizes the importance of privacy in relation to the personal information that it receives (including information about past, present and potential school trustees, board of education staff and event registrants). This policy describes the principles that BCSTA applies when protecting the personal information within its custody and control.

In British Columbia, the [Personal Information Protection Act](#) (PIPA) governs the way in which private sector organizations collect, use, keep, secure and disclose personal information. BCSTA is governed by PIPA.

II. Definitions

“Personal Information” means information about an identifiable individual and includes employee personal information, subject to applicable exceptions. Under PIPA, personal information does not include business contact information or work product information.

“Collection” means the act of gathering, acquiring or obtaining personal information from any source, by any means.

“Consent” in relation to “personal information” means an individual’s voluntary agreement to the proposed collection, use or disclosure of their personal information. Consent may be express or implied.

“Express consent” in relation to personal information, exists when an individual is directly asked for and provides his/her voluntary informed agreement to the collection, use or disclosure of personal information. Express consent may be verbal or in writing.

“Implied consent” exists when an individual is “deemed” to consent to the collection, use or disclosure of personal information if the individual voluntarily provides it for a purpose that would, at the time, be considered obvious to a reasonable person.

III. Scope

This Policy outlines the principles and practices applicable to the collection, use, disclosure, access and storage of personal information by BCSTA and its staff.

This Policy applies to govern BCSTA’s practices in relation to personal information. It does not apply to a person’s work product or business contact information (e.g. name, title, school board address, school board phone number, and school board e-mail address of currently elected school trustees, or current board of education

staff). BCSTA's Workplace Privacy Policy governs the collection, use, retention and disclosure of employee personal information.

IV. Accountability

BCSTA is responsible for maintaining the confidentiality and security of the personal information within its custody or under its control in compliance with PIPA.

This Policy is administered by the BCSTA Privacy Officer (contact information below) who is charged with responsibility for implementing the privacy program and ensuring compliance with applicable privacy legislation. The BCSTA Privacy Officer provides the BCSTA Board of Directors with regular reports regarding the privacy program.

Members of the BCSTA community (including directors, employees and volunteers) are responsible for day-to-day compliance with this Privacy Policy.

V. Consent

BCSTA collects, uses and discloses personal information only with the knowledge and consent of the individuals about whom the information pertains, except when required or permitted by law.

When collecting personal information BCSTA seeks to obtain express consent (e.g. through membership or event registration forms). However, BCSTA reserves the right to rely on implied or deemed consent where obtaining express consent is not practicable and otherwise complies with PIPA.

An individual may withdraw his/her consent at any time by contacting BCSTA's Privacy Officer.

VI. Limiting Collection, Use, and Disclosure

BCSTA limits its collection, use and disclosure of personal information to what is necessary for the purposes for which such information is collected or as authorized by PIPA. BCSTA does not sell personal information.

VII. Identifying Purposes

BCSTA communicates the purposes for which personal information is collected, used or disclosed at or before the time the information is collected as required by PIPA.

Generally, personal information may be collected by BCSTA for reasons including, but not limited to, the following:

- to communicate about BCSTA business or events;
- to provide member services;
- to process payments;

- to register individuals for BCSTA events.
- to facilitate attendance, meals or accommodations at BCSTA events;
- to comply with corporate governance and other legal requirements;
- to monitor member participation;
- to elicit feedback on and evaluate BCSTA programs and services;
- to respond to inquiries and complaints.

Personal information may also be collected by BCSTA from and about its employees. Please consult BCSTA's Employee Privacy Policy for further information about the collection, use and disclosure of employee personal information.

BCSTA works with public sector stakeholders, such as the BC Public School Employers' Association, and may, subject to PIPA, share information (e.g. contact information) with such groups to facilitate services to its and their members. Such information sharing takes place in compliance with PIPA and other legal requirements.

From time to time BCSTA may also share personal information with its consultants, suppliers, or business partners. Such information sharing takes place only to the extent necessary, as permitted by PIPA, and subject to the requirement that such parties obey and abide by the principles set out in this Privacy Policy.

VIII. Retention

BCSTA will retain personal information only for the duration it is needed for conducting its operations and complying with BCSTA's document retention procedures except where retention is otherwise required or permitted by law.

If BCSTA uses personal information to make a decision that directly affects an individual, that information will be retained for no less than one year from the date of the decision.

IX. Security

BCSTA protects personal information by ensuring security safeguards appropriate to the sensitivity of the information are in place, including through the use of the following measures:

- physical (i.e. locked filing cabinets, restricted access, appropriate security measures when disposing of personal information);
- organizational (i.e. security clearances, role based access to information);
- technological (i.e. passwords, firewalls, data disconnection from the internet and regular backups); and,
- ongoing training of employees.

X. Accuracy and Corrections

BCSTA will make all reasonable efforts to ensure that the personal information it collects is accurate and complete. If an individual finds errors of fact with his/her personal information, BCSTA's Privacy Officer (see below) may be notified to make the appropriate corrections.

XI. Access

BCSTA recognizes that individuals whose personal information has been collected for use by BCSTA have a right to access that personal information. Upon presentation of a written request and satisfactory identification, BCSTA will provide applicants with such information access as is permitted or required by PIPA:

- access to an individual's own personal information;
- an explanation of how a person's information is being or has been used;
- a list of individuals or organizations to whom their information has been disclosed.

In accordance with PIPA, information access will ordinarily be provided within 30 business days after receiving the applicant's written request. BCSTA reserves the right to charge permitted fees in appropriate cases. Where a fee may apply, the applicant will be notified in writing and direction as to whether or not to proceed with the request will be sought before any fee is incurred.

Should BCSTA deny an individual's request for access to all or part of his/her personal information, the individual will in accordance with PIPA be advised in writing of the reason for such a refusal and information on how to request a review by the Information and Privacy Commissioner will be provided.

XII. Questions or Concerns

Questions or complaints concerning BCSTA's compliance with this Privacy Policy may be submitted in writing to BCSTA's Privacy Officer.

Contact Information for BCSTA's Privacy Officer:

Phone: (604) 734-2721
Email: bcsta@bcsta.org
Mail 4th Floor-1580 West Broadway
Vancouver, BC V6J 5K9