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## Privacy Policy

### Wind & Tide's Commitment

Safeguarding confidentiality and protecting personal information is a fundamental concern of Wind & Tide Schools and Childcare Centres. Wind & Tide is committed to meeting or exceeding the privacy standards established by the BC Personal Information Protection Act (PIPA).

This personal information privacy policy is intended to explain the current legislation which is designed to protect privacy, to regulate the use and collection of information, and to state the steps Wind & Tide has taken to ensure personal and financial information is handled appropriately and securely.

### Privacy Protection in British Columbia

The Act requires an organization to obtain informed consent from an individual before collecting personal information about that individual, with certain exemptions. The organization must state why it is collecting the information, and how it will use the information collected. The Act also requires the organization to keep the information it has collected in a secure and safe manner, protecting the individual's right to have his or her information protected. The Act also describes with whom the personal information may be shared.

★ **NOTE:** *Wind & Tide does not fall under the Freedom of Information and Protection of Privacy Act (FOIPPA), which applies only to provincial government and its bodies; neither does it fall under the Protection of Personal Information and Electronic Documents Act (PIPEDA), a federal statute.*

### Ten Privacy Principles

As part of Wind & Tide's commitment, the following Ten Privacy Principles govern the actions as they relate to the use of personal information. These principles have been built upon the values set by the Canadian Standards Association's Model Code for the Protection of Personal Information and British Columbia's Personal Information Protection Act (PIPA).

#### Principle 1 – Accountability

Wind & Tide is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, Wind & Tide designates an individual(s) who is (are) accountable for the company's compliance with the Ten Privacy Principles. This individual is the Privacy Officer.

#### Principle 2 – Identifying Purposes

Wind & Tide will identify the purposes for which personal information is collected before or at the time the information is collected.

#### Principle 3 – Consent

Wind & Tide 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.

#### Principle 4 – Limiting Collection

Wind & Tide will limit the personal information collected to those details necessary for the purposes identified.

### **Principle 5 – Use, Disclosure and Retention**

Wind & Tide 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. Personal information will only be retained for the period of time required to fulfill the purpose for which it was collected.

### **Principle 6 – Accuracy**

Wind & Tide will maintain personal information in as accurate, complete and up-to-date form, as is necessary to fulfill the purposes for which it is to be used.

### **Principle 7 – Safeguarding Personal Information**

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

### **Principle 8 – Openness**

Wind & Tide will make information available to individuals concerning the policies and practices that apply to the management of their information.

### **Principle 9 – Individual Access**

Wind & Tide will inform an individual, upon the individual's request, of the existence, use and disclosure of the individual's information, and shall give the individual access to it in accordance with the law. Individuals may verify the accuracy and completeness of their information and may request that it be amended, if appropriate.

### **Principle 10 – Complaint Process**

Individuals may direct any questions or enquiries with respect to the Wind & Tide's privacy policies or practices to the Privacy Officer of Wind & Tide.

## **Privacy Policy Practices**

### ***What Information is Collected?***

*Wind & Tide gathers and uses personal information to provide each child with the best possible care and educational services enunciated by the Mission Statement of Wind & Tide. Most of the information collected comes directly from parent(s)/guardian(s) and only with their consent. When a parent/guardian applies to register a child in a Wind & Tide program, they will be asked to provide the information that enables the completion of the registration process. This also includes information on health and personal matters needed to provide the best possible education and care programs.*

### ***How is Information Used?***

#### ***Wind & Tide uses:***

- *personal information to communicate with parents/guardians, process applications and ultimately to provide parents/guardians and children with the educational services and care programs expected.*
- *personal information to enable Wind & Tide to operate its administrative function, including payment of fees and maintenance of programs including parent and volunteer participation.*

- anonymous/personal information to constantly improve our programs (example: surveys).
- health, psychological, or legal information 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 a different purpose, Wind & Tide will notify the parent/guardian and request consent prior to proceeding.

### **When may Information be Disclosed?**

Wind & Tide keeps personal information strictly confidential and treats it with care and respect. However, some of an individual's personal information may be shared with others as noted below:

#### **When Authorized by the Parent/Guardian**

- Other educational institutions may contact Wind & Tide for personal information about students. Parent/guardian permission is required to authorize disclosure of such information.
- Parent/guardian may request information to be shared with support consultants (Supported Child Development), speech therapists, occupational therapists or other professionals involved with their child's growth and development.
- 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 participation groups, parent meetings, fundraising, events, etc.

**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 email, 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 and government requirements. Only the information specifically requested is disclosed and Wind & Tide 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. Wind & Tide does not sell, lease or trade information about families or students to other parties.

### **Wind & Tide 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 your child but not your account with the school.

All employees of Wind & Tide are required to abide by the privacy standards governed under PIPA. They are also required to work within the principles of ethical behavior as set out in employment contracts and must follow all applicable laws and regulations. Employees are well informed about the importance of privacy and they are required to sign either a code of conduct or a confidentiality agreement that prohibits the disclosure of any personal information to unauthorized individuals or parties. To reinforce their understanding and commitment to upholding client privacy and confidentiality, employees periodically receive up-to-date literature about our privacy policy, principles and standards.

### **Restricting Sharing Information**

If you choose to limit the sharing of your personal information, please contact Wind & Tide's Administration 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 Does Wind & Tide Safeguard Information?**

Wind & Tide maintains current security standards to ensure that your personal and financial information is protected against unauthorized access, disclosure, inappropriate alteration or misuse.

### **Student Forms**

Only information that is required by licensing to be on site in the classroom is printed. This information is kept in registration binders, and should remain out of site of classroom visitors at all times. It is stored in secure locations when not in use. 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**

Wind & Tide manages electronic files appropriately with passwords and security measures that limit access by unauthorized personnel. The security practices are reviewed periodically to ensure that the privacy of information is not compromised.

### **Record Management**

Personal information is destroyed one year after the school no longer needs the information or one year after legal minimum retention requirements have been met.

### **Accessing and Amending Information**

Wind & Tide makes decisions based on the information it has and makes every effort to ensure information is accurate and complete.

### **Accessing Information**

Guardians can verify and amend personal information at any time on their Parent Portal. Guardians may also request access for any additional records (such as attendance) by contacting the Wind & Tide Administration

office. In situations of family breakdown, the school will grant access to records of children as determined by judicial review.

### **Questions, Concerns and Complaints**

Wind & Tide may add, modify or remove portions of this policy when it is considered appropriate to do so. Any changes will be made available on the Parent Portal document library within 24 hours. Questions, concerns, and complaints about privacy, confidentiality and information handling of the school may be addressed to the school's Privacy Officer by calling the Administration office at 604.575.0549. If necessary, Wind & Tide's complaint procedure and appeals policies will be utilized.