

ROOTS HOME EDUCATION PIPA POLICY

Policy Number	09-004
Revision (A, B, C....)	RevA
Date Approved / Revised	14 – Jan - 2009
Due Date for Review	30 – JUN – 2012
Committee Responsible	Home School
Date Originally Created	26 – OCT – 2005
Previous Policy Number	O6

POLICY

Roots will use common sense rules to balance the right of an INDIVIDUAL to have his or her PERSONAL INFORMATION protected with the need of the Roots program to collect, use or disclose PERSONAL INFORMATION for reasonable purposes. There will be a right of access to one's PERSONAL INFORMATION.

BACKGROUND

The Association for Christian Schooling in Calgary South acknowledges that personal information must be collected, stored and utilized in ways that protects families, students and staff while it is also crucial to have specific information in order to meet AB Education requirements, promote a Christian homeschooling community and provide services to Roots families.

PROCEDURES

1. PIPA Compliance Responsibility:

- a. The COMMITTEE Chairman serves as the Privacy Officer for Roots. The Privacy Officer is responsible to the COMMITTEE to ensure that INDIVIDUALS involved in the collection, use and disclosure of PERSONAL INFORMATION do so in compliance with the ACT.
- b. The Privacy Officer will be the contact for the public, EMPLOYEES and the Alberta PIPA Commissioner when privacy issues arise.
- c. All EMPLOYEES that perform duties on behalf of Roots are responsible for adhering to the PIPA Act and Regulations and the Roots PIPA Policy and Procedures.

2. Consent:

- a. All INDIVIDUALS must provide their consent in writing for Roots to collect, use and disclose PERSONAL INFORMATION using the form attached as Schedule A to this procedure. Membership or employment, as the case may be, will not be granted unless this form or a mutually acceptable revised form is signed.
- b. Requests by INDIVIDUALS to alter or withdraw their consent must be made in writing to the Privacy Officer. Within 15 days of receipt of the notice by the INDIVIDUAL, the Privacy Officer will advise such INDIVIDUAL of the likely consequences of their request. Should the INDIVIDUAL still want to alter or withdraw their consent, the Privacy Officer shall comply and inform the necessary Roots staff accordingly.

3. Collection:

- a. Roots shall only collect, use and disclose the PERSONAL INFORMATION noted on Schedule "B" attached hereto.
- b. 3.2 When Roots collects PERSONAL INFORMATION, they will:
 - 1) Except when inappropriate, collect directly from the INDIVIDUAL(s) concerned.
 - 2) Limit the type and amount of PERSONAL INFORMATION collected to meet the desired purpose for collection and no further.

- 3) Apply the appropriate level of security to the PERSONAL INFORMATION collected in accordance with Schedule “B”.
- c. Roots will make reasonable efforts to ensure that PERSONAL INFORMATION collected, used or disclosed by or on behalf of Roots is accurate and complete. INDIVIDUALS can request that their PERSONAL INFORMATION be corrected. If the information is wrong, Roots will correct it promptly. If consensus cannot be reached, annotation will be made that the information is disputed. Expert opinions cannot be corrected.

4. Disclosure:

- a. Roots will disclose PERSONAL INFORMATION only for purposes that are reasonable and only the specific information needed to fulfill the purposes.
- b. INDIVIDUALS shall be provided reasonable access to their PERSONAL INFORMATION unless stipulated otherwise in the Act.
- 1) The Roots PIPA officer shall receive requests and, as appropriate, request the Roots office assistant to process the requests.
 - 2) A reasonable fee may be charged at the discretion of the Roots Coordinator.
- c. 4.3 Notwithstanding clause 5.2, in no event will PERSONAL INFORMATION be disclosed outside the Roots Homeschool organization without the approval of the Privacy Officer, except such PERSONAL INFORMATION that is required to be disclosed under the School Act or the Act.
- d. Roots may disclose employee PERSONAL INFORMATION related to employment without consent when reasonably required for establishing, managing or terminating an employment relationship.

5. PERSONAL INFORMATION Security, Retention and Disposal:

- a. Roots will protect PERSONAL INFORMATION in its custody against risks such as unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction in accordance with the security level noted on Schedule “B” and defined in clause 6.2 hereof.
- b. Security Levels

Level	Definition	Security	Access
Public	PERSONAL INFORMATION already available in the public domain (i.e., telephone numbers)	None	<ul style="list-style-type: none"> • Any member of Roots • INDIVIDUAL to whom it relates or parent of INDIVIDUAL • Alberta Education • Trinity Christian School
Private	PERSONAL INFORMATION not readily available to the public.	Office File, Password-protected PC/Network	<ul style="list-style-type: none"> • Roots staff, Consultant or Committee • INDIVIDUAL to whom it relates or parent of INDIVIDUAL. • Trinity Christian School • Alberta Education
Confidential	PERSONAL INFORMATION that an INDIVIDUAL would reasonably want restricted access. (i.e., Student Records)	Locked File Cabinet, Password-protected PC/Network	<ul style="list-style-type: none"> • Roots Coordinator, Committee, assigned EA, Office Assistant, PE Instructor • INDIVIDUAL to whom it relates or parent if Individual • Trinity Christian School and other schools when officially requested • Alberta Education
Privileged	PERSONAL INFORMATION that only a few	Locked File	<ul style="list-style-type: none"> • COMMITTEE, Coordinator,

	select people have the privilege to view. (i.e., performance evaluations, salary information)	Cabinet, Password-protected PC/Network	Bookkeeper • Auditor • INDIVIDUAL to whom it relates with Privacy Officer's approval.
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c. Personal Information where the retention requirement pursuant to Schedule "B" has expired shall be destroyed.

- 1) Printed private, confidential or privileged PERSONAL INFORMATION shall be destroyed and disposed of.
- 2) Digital private, confidential or privileged PERSONAL INFORMATION in the case of a computer hard drive shall be erased and the recycle bin emptied. In the case of a compact disc, the disc shall be erased and the recycle bin emptied or the disc shall be destroyed and disposed of.

DEFINITIONS

1. "ACT" means Alberta's Personal Information Privacy Act.
2. "EMPLOYEES" includes volunteers, participants, students and individuals under contract or agency relationship.
3. "INDIVIDUAL" includes any ACSCS society member and any Roots' employee.
4. "COMMITTEE" means the Roots Homeschooling Committee.
5. "PERSONAL INFORMATION" means any 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
 - Consumer activity

PERSONAL INFORMATION does not include:

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

LEGISLATION

School Act
Alberta Regulation 145/2006, Home Education Regulation
Alberta Learning's Home Education Policy 1.1.2, August '00

Schedule "A" attached to and forming part of
the Roots PIPA Policy and Procedures

Consent Form for Personal Information

I, _____, consent to allow the Roots homeschooling program of Trinity Christian School to collect, use or disclose personal information for its operational and administrative purposes, including, but not limited to:

- Eligibility and pre-assessment
- Learning assessments
- Student counseling
- Student health and safety
- Special Events
- Student / Family liaison
- Development
- Finance Administration

I understand that Roots is subject to provincial and federal privacy legislation and has in place a policy on privacy to ensure compliance with privacy legislation and standards.

I am aware of the risks and benefits associated with consenting or not consenting to collection, and that I may revoke my consent at any time by providing a signed, written statement of revocation to the Roots office.

Signature: _____

Date: _____

In addition, I consent to allow Roots to take, collect and/or display photos of myself and/or family members for promotional purposes, as indicated below.

Yes No website

Yes No printed Roots literature used for promotion of Roots

Yes No electronic presentations at Roots and public functions

Yes No display boards at public functions such as homeschool conferences

Signature: _____

Date: _____

PIPA consents are valid until the family leaves Roots or the employee discontinues their relationship with Roots, according to the parameters of the Roots PIPA Policy. Permission may be changed or revoked at any time by providing a signed, written statement of revocation to the Roots office.

Schedule “B” attached to and forming part of the
Roots PIPA Policy and Procedures

Category	Personal Information Description	Responsible Person	Retention	Security Requirement	Comments
Student 01	Personal Information including name, birth date, age, grade etc	Coordinator, EA Office Assistant Trinity Admin staff	MT + 120 MT + 4	Private	
Student 02	Student Records	Office Assistant TCS Office	As AB ED regulates		Follow Alberta Educations’s student records policy
Student 03	Health Information	Office Assistant PE staff	MT +4	Private	
Student 04	Student Reports	Office Assistant EA	MT +4	Confidential	
Family 01	Names, telephone numbers, email addresses	Office Assistant		Public	Provided already in public domain
Family 02	Membership Application Forms	Office Assistant COMMITTEE	MT +4	Confidential	
Family 03	Pastoral Membership Application References	Office Assistant COMMITTEE	MT +4	Privileged	
Family 04	Membership Application Interviewer comments	Office Assistant COMMITTEE	MT +4	Privileged	
Family 05	Curriculum Funding receipts/payments	Bookkeeper Office Assistant	84	Confidential	
Staff 01	Consultant file containing compensation, performance evaluation information, references etc	Coordinator Bookkeeper	MT + 84	Privileged	
Staff 02	Coordinator file containing compensation, performance evaluation information, references etc	COMMITTEE Bookkeeper	MT + 84	Privileged	
Staff 03	Criminal Background Checks	Office Assistant Coordinator	indefinite	Privileged	
Committee 01	Minutes of Meetings	Secretary Coordinator ACSCS Board Committee	indefinite 24	Privileged	

MT – Membership/Employment terminated date + # of month