

St. Catherine's Elementary School
20244 32nd Avenue,
Langley, BC V2Z 2E1



**PERSONAL INFORMATION
AND PRIVACY POLICY FOR
EMPLOYEES AND
VOLUNTEERS
Policy # 32**

Rationale:

St. Catherine's is committed to ensuring the protection and security of all Personal Information within its control. St. Catherine's recognizes the importance of privacy in relation to personal information it receives and maintains about employees, volunteers, and contracted service providers. St. Catherine's is subject to comply with the BC [Personal Information Protection Act](#). And St. Catherine's believes it is important to make every effort to ensure the accuracy, privacy, confidentiality, and security of such information in accordance with the PIPA. This Policy describes the principles St. Catherine's will apply when protecting Staff personal information.

Scope:

This policy applies to all employees, contractors, and volunteers of St. Catherine's. All Staff are to recognize the importance of privacy in relation to personal information St. Catherine's receives and maintains about employees, volunteers, and contracted service providers.

Policy:

The administration of this Policy is the responsibility of St. Catherine's Principal. All school employees, contractors, and volunteers will follow St. Catherine's procedures for collecting, using, maintaining, and protecting Staff personal information.

Definitions:

Personal information - refers to any information about an identifiable individual that is collected, used, disclosed, or processed by St. Catherine's in connection with St. Catherine's services, operations, or administration, but it does not include Staff contact information or work product information.

Privacy Officer - is the first point of contact in an organization when privacy issues arise. The person has the authority to intervene on privacy issues relating to any of your organization's operations.

Privacy Breach - means the theft or loss of or the collection, use, or disclosure of Personal Information not authorized by the BC *Personal Information Protection Act* (PIPA) and includes cyber and ransomware attacks and other situations where there are reasonable grounds to believe that any such unauthorized activities have taken place or there is a reasonable belief that they will take place.

Staff – For this purpose of this policy, "Staff" refers to employees, volunteers, contracted service providers and persons authorized to access student records when planning for, or delivering, health services, social services or other support services to a student of St. Catherine's.

Procedures:

The Privacy Officer is the Principal, Mr. Jeff Brophy. Henceforth, when referring to the Privacy Officer in this policy, we are referring to Mr. Brophy.

1. St. Catherine's Accountability for Personal Information and Privacy

Maintaining the privacy and security of personal information is important to St. Catherine's. The Staff are accountable for the protection of the personal information within St. Catherine's control, and St. Catherine's will have a Privacy Officer who is responsible for implementing St.

Catherine's privacy management program and ensuring it complies with the PIPA and other applicable privacy laws.

Staff who have questions about how St. Catherine's uses, processes, manages, and protects personal information may contact St. Catherine's Privacy Officer. The Privacy Officer can be reached at St. Catherine's via St. Catherine's phone number (604-534-6564) or email address (jbrophy@stcatherines.ca).

2. The Privacy Officer

St. Catherine's Privacy Officer is responsible for:

- conducting a privacy audits and self-assessments;
- developing St. Catherine's Privacy Policy/ies;
- implementing and maintaining the Privacy Policy/ies;
- managing privacy training;
- responding to requests for access to and correction of personal information; and
- working with the BC Privacy Commissioner in the event of an investigation.

The Privacy Officer shall be familiar with the [Personal Information Protection Act](#) and the [ten principles of privacy protection](#).

3. The Basis/Purpose for Which St. Catherine's Collects Personal Information

St. Catherine's is permitted to collect, use, and disclose personal information about staff where reasonably required in order to establish, manage, or end the employment/contract/volunteer relationship and for other purposes that are permitted under applicable laws.

If St. Catherine's seeks to use staff personal information for other purposes, St. Catherine's will ask for the individual's consent before doing so unless otherwise permitted under the PIPA or other applicable laws. Consent may be expressed or implied and can be in written or verbal form.

When the staff member provides consent for the collection, use, or disclosure of their personal information, that consent can be withdrawn at any time, on reasonable notice. However, withdrawing consent may have an impact on the benefits, programs, or other services that St. Catherine's is able to provide to the staff member. Consent cannot be withdrawn when disclosure is required by law (e.g., EI premiums, Teacher Regulation Branch). Questions about withdrawing consent should be directed to St. Catherine's Privacy Officer.

4. How St. Catherine's Will Use and Disclose Personal Information

St. Catherine's will endeavour to communicate the purposes for which personal information is collected at or before the time the information is collected.

In the ordinary course of operations, St. Catherine's may collect the personal information of a staff member for the purposes of managing St. Catherine's relationship with that individual, including for the following purposes of:

- recruiting and hiring;
- improving and evaluating St. Catherine's programs and services;
- staffing, scheduling, and business and service delivery purposes;
- performance evaluation and monitoring;
- promotion, demotion, and discipline;
- investigating specific incidents involving employees;
- payroll and benefits administration;
- ensuring staff safety in the workplace; and
- complying with St. Catherine's legal and regulatory obligations.

St. Catherine's may disclose personal information about staff for these purposes or for other purposes permitted under applicable privacy laws, such as, where applicable, to St. Catherine's services and benefits providers, legal counsel, insurers, or law enforcement officials. St. Catherine's will seek the staff member's consent for other uses of the individual's personal information where required under applicable laws.

The personal information St. Catherine's may collect for these purposes includes information such as:

- name, contact information, and social insurance number;
- information about the staff member's employment history, education, and qualifications;
- financial and banking information needed for payroll and benefits administration;
- information about workplace performance, conduct, and attendance;
- information related to investigations into workplace incidents;
- information needed to respond to complaints or concerns;
- information about the staff member's health and medical status if needed to manage and administer employment or employment related benefits; and
- other information that St. Catherine's is required by law to maintain in order to manage its relationship with staff members or to comply with St. Catherine's legal obligations.

5. *Privacy and Devices and Electronic Systems*

St. Catherine's may employ technologies that track, monitor, and allow it to audit user activity on devices and electronic systems owned or operated by St. Catherine's. While reasonable personal use of such systems and equipment may be permissible during off-duty hours, Staff who choose to use such devices and systems to conduct personal business should be aware of the privacy implications of doing so. St. Catherine's systems may automatically track, retain access, and use information about a user's online and system activity, including when undertaken for personal use.

While such information is tracked and monitored for system security and maintenance purposes, St. Catherine's reserves the right to access and use such usage and browser history in order to address security incidents or investigate Staff misconduct (including inappropriate workplace activity and time theft) and other incidents.

6. *Who St. Catherine's Shares Information With*

St. Catherine's shares personal information with St. Catherine's employees and contracted service providers who need to know such information for purposes related to the person's employment or engagement by St. Catherine's, including the purposes described above and for legal, administrative, and operational purposes. Some of St. Catherine's service providers, including online service providers, may store personal information using cloud services inside or outside of Canada.

7. *Limiting Collection, Use, Disclosure & Retention*

St. Catherine's endeavours to limit the collection of personal information to what is necessary for the purposes for which it is collected, and St. Catherine's retains personal information for only as long as it is needed for the delivery of services or for professional, legal, administrative or operational purposes. When it is no longer needed for these purposes, it will be securely destroyed.

8. *How St. Catherine's Will Protect Personal Information*

St. Catherine's 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:

- a) physical (i.e., locked filing cabinets, restricted access, appropriate security measures when disposing of personal information);

- b) administrative (i.e., security clearances, access only on a “need to know” basis);
- c) technological (i.e., passwords, firewalls, data disconnection from the internet, and regular backups) and training of employees; and
- d) contractual, by requiring St. Catherine's service providers to commit to appropriate standards of privacy and data security.

9. The Accuracy of a Person's Information

St. Catherine's will make reasonable efforts to ensure that personal information is as accurate, complete, and current as required for the purposes for which it was collected. In some cases, St. Catherine's may ask a staff member to assist in ensuring that the person's information is accurate and up-to-date.

10. Staff Member Rights

A staff member has a right to access their personal information within the control of St. Catherine's. St. Catherine's will receive and respond to requests for access to personal information in accordance with the PIPA and other applicable laws. In some cases, St. Catherine's may refuse access to certain records or information such as where the disclosure of information may threaten someone else's safety, mental or physical health, where disclosure could be harmful to the personal privacy of a third party, or in order to protect other important interests, but St. Catherine's will only do so to the extent this is authorized by applicable laws.

A person also has a right to challenge the accuracy and completeness of their personal information that is collected by St. Catherine's. St. Catherine's will receive and respond to all such requests in accordance with the requirements of the PIPA.

If a person wishes to make a request for access or correction of their personal information, the person may do so by submitting a written request to St. Catherine's Privacy Officer.

11. Who to Contact if One Has Questions, Concerns or Complaints

Questions, issues of concern or complaints about the processing or protection of a staff member's personal information should be directed to St. Catherine's Privacy Officer, Mr. Jeff Brophy. The Privacy Officer will respond to and, where applicable, will investigate all complaints or concerns about violations of this Policy or other applicable privacy laws.

12. Update to This Policy

This Privacy Policy may be updated from time to time or as St. Catherine's review cycle.

Reference(s): • Personal Information Protection Act (PIPA) • A Guide to B.C.'s Personal Information Protection Act for Businesses and Organizations	Approved by: St. Catherine's Parish Education Committee Date Approved: September 1, 2026
Cross-reference(s): • <i>Personal Information and Privacy Policy for Students and Parents/Guardians</i> • <i>Critical Incident and Privacy Breach Response Policy.</i> • <i>Student Records Policy.</i> • <i>St Catherine's School Policy Manual Link: STCPolicyManual</i>	Date(s) revised: Summer 2026