Richmond School District
7811 Granville Avenue, Richmond BC V6Y3E3
604-668-6000 I sd38.bc.ca

Policy Committee

Public Meeting Agenda

Monday, June 9, 2025 – 11:00 am
via Zoom

https://sd38.zoom.us/j/61808664353
Passcode: 6000

The Richmond Board of Education acknowledges and thanks the First Peoples of the hən̓q̓əmin̓əm̓ language group on whose traditional and unceded territories we teach, learn and live.

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1. **Adopt Agenda**

2. **Approve Minutes**
   Public minutes from meeting held May 12, 2025 attached.

3. **Policy Refresh to align with DEI checklist (standing item):**
   Policy 311/311-R: Freedom of Information and Protection of Privacy
   Policy 311-G (A): Privacy Impact Assessments
   Policy 311-G (B): Critical Incident and Privacy Breach Procedure
   Polciy 311-G (C): Personal Information Management Program
   Report from the Superintendent is attached.

4. **Status of Current and Anticipated Items**
   Status Update attached.

5. **Next Meeting Date – September 2025**

6. **Adjournment**

RICHMOND
SCHOOL DISTRICT NO.38

Richmond School District
7811 Granville Avenue, Richmond BC V6Y3E3
604-668-6000 I sd38.bc.ca

Policy Committee

Public Meeting Minutes

Monday, May 12, 2025 – 11:00 am
Via Zoom

Present:

Chairperson	D. Tablotney
Vice Chairperson	D. Yang
Trustee Member	A. Wong
Superintendent	C. Usih
Secretary Treasurer	C. Wang
President, Richmond Teachers' Association	L. Baverstock
3rd Vice President, Richmond Teachers' Association	J. Cho
President, Canadian Union of Public Employees 716	S. Robinson*
Vice President, Richmond Association of School Administrators	A. Goulas
Chair, Richmond Management and Administrative Professionals	K. Gibson
President, Richmond District Parents Association	C. Huang*
Representative, Richmond District Parents Association	K. Ching
Executive Assistant (Recording Secretary)	J. Coronel

*Present for a portion of the meeting

The Chairperson called the meeting to order at 11:01 am.

The Richmond Board of Education acknowledged and thanked the First Peoples of the hən̓q̓əmin̓əm̓ language group on whose traditional and unceded territories we teach, learn and live.

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1. Adopt Agenda

The agenda was adopted as circulated.

2. Approve Minutes

Minutes of the meeting held April 14, 2025 were approved as circulated.

3. Policy 201 Bylaw: Board Operations

The Secretary Treasurer spoke to her report as included in the agenda package.

In response to a question from the President, Richmond Teachers' Association, the Secretary Treasurer clarified that the intent of the two-week notice period for presentations/briefs to be included in the agenda applies to requests submitted by members of the public. The existing process for requests submitted by partner groups remains unchanged.

The Committee then agreed to forward the following **RECOMMENDATION** to the board:

> THAT the Chairperson of the Policy Committee bring forward a Notice of Motion to the Board of Education at the May 21, 2025, public meeting that a recommendation for the board's consideration will be presented at the June 18, 2025, public meeting to approve the revisions of ***Policy 201 Bylaw: Board Operations.***

S. Robinson joined the meeting at 11:06 am.
C. Huang joined the meeting at 11:14 am.

4. Status of Current and Anticipated Items

A Status of Current and Anticipated Items was attached to the agenda package.

5. Next Meeting Date – Monday, June 9, 2025 at 11:00 am.

6. Adjournment

The meeting adjourned at 11:23 am.

Respectfully Submitted,

Debbie Tablotney
Chairperson, Policy Committee

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RICHMOND
SCHOOL DISTRICT NO.38

Richmond School District
7811 Granville Avenue, Richmond BC V6Y3E3
604-668-6000 I sd38.bc.ca

Report to Policy Committee Public

Date: June 9, 2025

From: Christopher Usih, Superintendent

Subject: **Policy Refresh to Align with DEI checklist:**
Policy 311/311-R: Freedom of Information and Protection of Privacy

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RECOMMENDATION:

THAT the Chairperson of the Policy Committee bring forward a Notice of Motion to the Board of Education at the June 18, 2025, public meeting that a recommendation for the board's consideration will be presented at the next public meeting (TBD) to approve the minor revisions for Policy 311 and 311-R.

INTRODUCTION:

The purpose of this report is to provide a draft timeline, background information, and proposed minor revisions (i.e., housekeeping) to Policy 311 and 311-R. Proposed minor revisions for Policy 311-G Administrative Guidelines (A), (B), and (C) are attached for reference.

BACKGROUND:

It is anticipated that staff will be bringing to each Policy Committee meeting, minor revisions to existing policies and/or regulations in accordance with Policy 204-R: Development and Revision of Policy and Regulation, and the Checklist for Policy, Regulations and Guidelines Revision and Development. Ultimately, all minor revisions supported by Policy Committee will require approval at a public meeting of the Board of Education.

POLICY CONSIDERATIONS:

The proposed minor revisions to Policy 311 and 311-R, are guided by the need to align existing policies with new understandings through a DEI lens (see Checklist for Policy, Regulations and Guidelines Revision and Development).

A specific example of the type of language requiring attention throughout the Board's Policy Manual is the often used term, "stakeholder." The provincial government has developed and posted online a document titled ***Terminology in Indigenous context*** which articulates that the term "stakeholder' is a common cooperate term for partners which has negative connotations to many Indigenous Peoples." Policies are being aligned with the Ministry guidance, and the term "stakeholder" is being replaced with "partner group".

In addition, the necessity to review existing Board policies and regulations (described above) provides the opportunity for greater consistency regarding a range of items such as the use of jargon, gender neutral language, capitalization, spacing, spelling, hyphenation, district job title modifications, and

Ministry of Education and Child Care changes over time. Draft revisions will be guided by Canadian journalistic grammar standards, primarily embodied by the Canadian Press Stylebook, emphasize clarity, accuracy, and precision. Key aspects include using plain language, avoiding jargon, etc. The stylebook also provides detailed rules for capitalization, punctuation, and other aspects of writing.

LEGISLATIVE CONSIDERATIONS:

School Act - Section 85: Power and Capacity
For the purposes of carrying out its powers, functions, and duties under the School Act, a board has the power and capacity to determine local policy.

PROPOSED TIMELINE:

Dates	**Meeting**	**Comments**
May 12, 2025	Policy Committee (In-camera)	Report submitted to Policy Committee (In-camera) with draft minor policy revisions attached. Opportunity for trustee review and feedback.
June 9, 2025	Policy Committee (Public)	Draft revised policy incorporating trustee feedback submitted to Policy Committee (Public). Possible Notice of Motion for approval at the June Board of Education (Public) Meeting.
June 18, 2025	Board of Education (Public)	Possible Notice of Motion to the June Board of Education (Public) Meeting for final approval at the September board meeting.
September 24, 2025	Board of Education (Public)	Recommendation for board approval of revised policy.

Respectfully submitted,

Christopher Usih
Superintendent

Attachments:
1. *Policy 311 and 311-R, with proposed minor revisions (track changes & clean versions)*
2. *Policy 311-G Administrative Guidelines (A), (B), (C) (track changes & clean versions)*
3. *Provincial Government Document: Terminology in Indigenous context*
4. *Checklist for Policy, Regulations and Guidelines Revision and Development*

RICHMOND SCHOOL DISTRICT NO.38

Policy

Revised draft – with changes tracked

ADMINISTRATION

Policy 311

Freedom of Information and Protection of Privacy

The Board of Education of School District No. 38 (Richmond) is committed to ensuring the privacy, confidentiality, and security of all personal information that it collects, uses, discloses, and maintains in connection with its programs and activities. The bBoard complies with the *School Act* and the *Freedom of Information and Protection of Privacy Act* in relation to the protection of privacy. This pPolicy sets out the bBoard's commitment, standards, and expectations regarding the appropriate practices for the collection, use, and protection of personal information.

DRAFT

Adopted: 21 June 2023

ADMINISTRATION Policy 311

Freedom of Information and Protection of Privacy

The Board of Education of School District No. 38 (Richmond) is committed to ensuring the privacy, confidentiality, and security of all personal information that it collects, uses, discloses, and maintains in connection with its programs and activities. The board complies with the *School Act* and the *Freedom of Information and Protection of Privacy Act* in relation to the protection of privacy. This policy sets out the board's commitment, standards, and expectations regarding the appropriate practices for the collection, use, and protection of personal information.

DRAFT

Adopted: 21 June 2023

RICHMOND SCHOOL DISTRICT NO.38

Revised draft – with changes tracked

Regulation

ADMINISTRATION Policy 311-R

Freedom of Information and Protection of Privacy

1. Principles

The Board of Education of School District No. 38 (Richmond) (the "District"), Trustees, and all District Employees shall uphold the privacy, confidentiality, and appropriate use of personal information in compliance with the *School Act*, *Freedom of Information and Protection of Privacy Act* (*FIPPA*), and these Guidelines, including by:

- being open and transparent about the purposes for which personal information may be collected and used by the District;
- collecting and using personal information only as necessary to carry out the District's authorized programs and activities;
- sharing personal information internally with Employees only on a need-to-know basis;
- sharing personal information with third parties with the knowledge and consent of affected individuals, unless otherwise authorized or required under *FIPPA*, the *School Act*, or other applicable laws;
- ensuring personal information is protected against unauthorized access, use, disclosure, loss, or destruction; and
- complying with *FIPPA* and all procedures for the accuracy, protection, use, disclosure, storage, retrieval, correction, and appropriate use of personal information.

2. Transparency and Accountability

The Board strives to be open and transparent with the community about its programs and ~~activities, and~~activities and has processes in place to support the timely response to access requests submitted under *FIPPA* and the proactive release of information of interest to the community.

3. Responsibility

The Superintendent of Schools has been designated by the Board as the "Head" of the District for the purposes of ~~*FIPPA, and*~~*FIPPA* and has overarching responsibility for ensuring compliance with this Policy, *FIPPA*, and the requirements of the *School Act* pertaining to privacy management.

4. Complaints

The District will respond to, and~~,~~ where appropriate, investigate~~,~~ all complaints that it receives under this Policy concerning its personal information management practices.

Adopted: 21 June 2023

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5. Definitions

5.1 "**Employees**" means all employees, contractors, and volunteers of the District.

5.2 "**FIPPA**" means the *British Columbia Freedom of Information and Protection of Privacy Act,* and regulations.

5.3 "**Personal Information**" means recorded information about an identifiable individual, that is within the control of the District and includes information about any student or any Employee of the District. Personal information does not include an individual's business contact information, such as business address, email address, and telephone number, that would allow a person to be contacted at work.

5.4 "**Guidelines**" means procedures enacted by the District under its Policy on Freedom of Information and Protection of Privacy.

References

Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c. Part 3
School Act, R.S.B.C. 1996, c. 412 sections 9, 79(3)
Student Records Disclosure Order (M14/91)

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ADMINISTRATION Policy 311-R

Freedom of Information and Protection of Privacy

1. Principles

The Board of Education of School District No. 38 (Richmond) (the district), trustees, and all district employees shall uphold the privacy, confidentiality, and appropriate use of personal information in compliance with the *School Act*, *Freedom of Information and Protection of Privacy Act* (*FIPPA*), and these guidelines, including by:

- being open and transparent about the purposes for which personal information may be collected and used by the district;
- collecting and using personal information only as necessary to carry out the district's authorized programs and activities;
- sharing personal information internally with employees only on a need-to-know basis;
- sharing personal information with third parties with the knowledge and consent of affected individuals, unless otherwise authorized or required under *FIPPA*, the *School Act,* or other applicable laws;
- ensuring personal information is protected against unauthorized access, use, disclosure, loss, or destruction; and
- complying with *FIPPA* and all procedures for the accuracy, protection, use, disclosure, storage, retrieval, correction, and appropriate use of personal information.

2. Transparency and Accountability

The board strives to be open and transparent with the community about its programs and activities and has processes in place to support the timely response to access requests submitted under *FIPPA* and the proactive release of information of interest to the community.

3. Responsibility

The superintendent of schools has been designated by the board as the head of the district for the purposes of *FIPPA* and has overarching responsibility for ensuring compliance with this policy, *FIPPA,* and the requirements of the *School Act* pertaining to privacy management.

4. Complaints

The district will respond to, and where appropriate, investigate all complaints that it receives under this policy concerning its personal information management practices.

DRAFT

5. Definitions

5.1 **Employees** means all employees, contractors, and volunteers of the district.

5.2 **FIPPA** means the *British Columbia Freedom of Information and Protection of Privacy Act,* and regulations.

5.3 **Personal Information** means recorded information about an identifiable individual, that is within the control of the district and includes information about any student or any employee of the district. Personal information does not include an individual's business contact information, such as business address, email address, and telephone number, that would allow a person to be contacted at work.

5.4 **Guidelines** means procedures enacted by the district under its policy on Freedom of Information and Protection of Privacy.

References

Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c. Part 3
School Act, R.S.B.C. 1996, c. 412 sections 9, 79(3)
Student Records Disclosure Order (M14/91)

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Privacy Impact Assessments

Purpose

The Board of Education of School District No. 38 (Richmond) (the "District") is responsible for ensuring that it protects the personal information within its custody and control, including by complying with the provisions of the *Freedom of Information and Protection of Privacy Act* ("*FIPPA*"). *FIPPA* requires that the district conduct a Privacy Impact Assessment ("PIA") to ensure that all collection, use, disclosure, protection, and processing of personal information by the district is compliant with *FIPPA*.

A Privacy Impact Assessment (PIA) is an in-depth review of any new or significantly revised initiative, project, activity, or program to ensure that it is compliant with the provisions of *FIPPA*, to identify and mitigate risks arising from the initiative and to ensure that the initiative appropriately protects the privacy of individuals.

The purpose of these guidelines is to set out the district's process for conducting PIAs in accordance with the provisions of *FIPPA*.

1. Definitions

1.1 **Employees** means all employees, contractors, and volunteers of the district.

1.2 **FIPPA** means the *British Columbia Freedom of Information and Protection of Privacy Act*, and regulations thereto.

1.3 **Guidelines** means procedures enacted by the district under its policy on Freedom of Information and Protection of Privacy.

1.4 **Head** means the Superintendent of Schools or any person to whom the Superintendent has delegated (in writing) their powers under these guidelines.

1.5 **Initiative** means any enactment, system, project, program, or activity of the district;

1.6 **Personal information** means any recorded information about an identifiable individual that is within the control of the district and includes information about any student or any employee of the district. Personal information does not include an individual's business contact information, such as business address, email address, and telephone number, that would allow a person to be contacted at work.

1.7 **PIA** means a Privacy Impact Assessment performed in accordance with the requirements of *FIPPA*.

1.8 **Privacy Officer** means the Secretary-Treasurer who has been designated by the Head as the privacy officer for the district.

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1.9 **Responsible Employee** means the dDepartment hHead or other eEmployee who is responsible for overseeing an iInitiative, and in the event of doubt, means the eEmployee designated in the PIA as the rResponsible eEmployee.;

1.10 **Supplemental Review** means an enhanced process for reviewing the privacy and data security measures in place to protect sensitive pPersonal iInformation in connection with an iInitiative involving the storage of pPersonal iInformation outside of Canada.

2. Scope & Responsibility

2.1 These gGuidelines apply to all new and significantly revised iInitiatives of the dDistrict.

2.2 All eEmployees are expected to be aware of and follow these gGuidelines in the event that they are involved in a new or significantly revised iInitiative.

2.3 Departments and management employees are responsible to plan and implement new or significantly revised iInitiatives in accordance with the requirements of these gGuidelines.

3. District Responsibilities

3.1 The sSuperintendent of sSchools is the h"Head" of the dDistrict for all purposes under *FIPPA*.

3.2 The sSuperintendent of sSchools has delegated the administration of these gGuidelines to the sSecretaryy- -tTreasurer, who is the p"Privacy oOfficer" of the dDistrict for all purposes under *FIPPA*.

3.3 The pPrivacy oOfficer is responsible to, in consultation with the hHead, ensure that all PIAs and sSupplemental rReviews are completed in accordance with the requirements of *FIPPA* and these gGuidelines.

4. Responsibilities of All Employees

4.1 Any eEmployee responsible for developing or introducing a new or significantly revised iInitiative that involve or may involve the collection, use, disclosure, or processing of pPersonal iInformation by the dDistrict must report that iInitiative to the pPrivacy oOfficer at an early stage in its development.

4.2 All eEmployees involved in a new or significantly revised iInitiative will cooperate with the pPrivacy oOfficer and provide all requested information needed to complete the PIA.

4.3 All eEmployees will, at the request of the pPrivacy oOfficer, cooperate with the pPrivacy oOfficer in the preparation of any other PIA that the pPrivacy oOfficer decides to perform.

5. The Role of the Responsible Employee

Responsible eEmployees are responsible for:

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5.1 ensuring that new and significantly revised iInitiatives for which they are the rResponsible eEmployee are referred to the pPrivacy oOfficer for completion of a PIA;

5.2 supporting all required work necessary for the completion and approval of the PIA;

5.3 being familiar with, and ensuring that the iInitiative is carried out in compliance with the PIA; and

5.4 requesting that the pPrivacy oOfficer make amendments to the PIA when needed and when significant changes to the iInitiative are made.

6. Initiatives Involving the Storage of Personal Information Outside of Canada

6.1 Employees may not engage in any new or significantly revised iInitiative that involves the storage of pPersonal iInformation outside of Canada, until the pPrivacy oOfficer has completed and the hHead has approved a PIA and any required sSupplemental rReview.

6.2 The rResponsible eEmployee or dDepartment may not enter into a binding commitment to participate in any iInitiative that involves the storage of pPersonal iInformation outside of Canada, unless any required sSupplemental rReview has been completed and approved by the hHead.

6.3 It is the responsibility of the pPrivacy oOfficer to determine whether a sSupplemental rReview is required in relation to any iInitiative, and to ensure that the sSupplemental rReview is completed in accordance with the requirements of *FIPPA*.

6.4 The pPrivacy oOfficer is responsible for reviewing, and, if appropriate, approving all sSupplemental rReviews, and in doing so must consider risk factors including:

6.4.1 the likelihood that the iInitiative will give rise to an unauthorized collection, use, disclosure, or storage of pPersonal iInformation;

6.4.2 the impact to an individual of an unauthorized collection, use, disclosure or storage of pPersonal iInformation;

6.4.3 whether the pPersonal iInformation is stored by a service provider;

6.4.4 where the pPersonal iInformation is stored; and

6.4.5 whether the sSupplemental rReview sets out mitigation strategies proportionate to the level of risk posed ted by the iInitiative.

6.5 Approval of a sSupplemental rReview by the hHead shall be documented in writing.

7. Inquiries

7.1 Questions or comments about these gGuidelines may be addressed to the pPrivacy oOfficer at privacy@sd38.bc.ca. The dDistrict will respond to all inquiries in writing.

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Related Acts and Regulation

School Act

British Columbia Freedom of Information and Protection of Privacy Act (FIPPA)

Supporting References, Policies, Procedures, and Forms

Policy 311 Freedom of Information and Protection of Privacy

Policy 311-R Privacy Management

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Adopted: 21 June 2023

Privacy Impact Assessments

Purpose

The Board of Education of School District No. 38 (Richmond) (the district) is responsible for ensuring that it protects the personal information within its custody and control, including by complying with the provisions of the *Freedom of Information and Protection of Privacy Act (FIPPA)*. *FIPPA* requires that the district conduct a Privacy Impact Assessment (PIA) to ensure that all collection, use, disclosure, protection, and processing of personal information by the district is compliant with *FIPPA*.

A Privacy Impact Assessment (PIA) is an in-depth review of any new or significantly revised initiative, project, activity, or program to ensure that it is compliant with the provisions of *FIPPA*, to identify and mitigate risks arising from the initiative and to ensure that the initiative appropriately protects the privacy of individuals.

The purpose of these guidelines is to set out the district's process for conducting PIAs in accordance with the provisions of *FIPPA*.

1. Definitions

1.1 **Employees** means all employees, contractors, and volunteers of the district.

1.2 **FIPPA** means the *British Columbia Freedom of Information and Protection of Privacy Act*, and regulations.

1.3 **Guidelines** means procedures enacted by the district under its policy on Freedom of Information and Protection of Privacy.

1.4 **Head** means the superintendent of schools or any person to whom the superintendent has delegated (in writing) their powers under these guidelines.

1.5 **Initiative** means any enactment, system, project, program, or activity of the district;

1.6 **Personal Information** means any recorded information about an identifiable individual that is within the control of the district and includes information about any student or any employee of the district. Personal information does not include an individual's business contact information, such as business address, email address, and telephone number, that would allow a person to be contacted at work.

1.7 **PIA** means a Privacy Impact Assessment performed in accordance with the requirements of *FIPPA*.

1.8 **Privacy Officer** means the secretary-treasurer who has been designated by the head as the privacy officer for the district.

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1.9 **Responsible Employee** means the department head or other employee who is responsible for overseeing an initiative, and in the event of doubt, means the employee designated in the PIA as the responsible employee.

1.10 **Supplemental Review** means an enhanced process for reviewing the privacy and data security measures in place to protect sensitive personal information in connection with an initiative involving the storage of personal information outside of Canada.

2. Scope & Responsibility

2.1 These guidelines apply to all new and significantly revised initiatives of the district.

2.2 All employees are expected to be aware of and follow these guidelines in the event that they are involved in a new or significantly revised initiative.

2.3 Departments and management employees are responsible to plan and implement new or significantly revised initiatives in accordance with the requirements of these guidelines.

3. District Responsibilities

3.1 The superintendent of schools is the head of the district for all purposes under *FIPPA*.

3.2 The superintendent of schools has delegated the administration of these guidelines to the secretary-treasurer, who is the privacy officer of the district for all purposes under *FIPPA*.

3.3 The privacy officer is responsible to, in consultation with the head, ensure that all PIAs and supplemental reviews are completed in accordance with the requirements of *FIPPA* and these guidelines.

4. Responsibilities of All Employees

4.1 Any employee responsible for developing or introducing a new or significantly revised initiative that involve or may involve the collection, use, disclosure, or processing of personal information by the district must report that initiative to the privacy officer at an early stage in its development.

4.2 All employees involved in a new or significantly revised initiative will cooperate with the privacy officer and provide all requested information needed to complete the PIA.

4.3 All employees will, at the request of the privacy officer, cooperate with the privacy officer in the preparation of any other PIA that the privacy officer decides to perform.

5. The Role of the Responsible Employee

Responsible employees are responsible for:

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5.1 ensuring that new and significantly revised initiatives for which they are the responsible employee are referred to the privacy officer for completion of a PIA;

5.2 supporting all required work necessary for the completion and approval of the PIA;

5.3 being familiar with, and ensuring that the initiative is carried out in compliance with the PIA; and

5.4 requesting that the privacy officer make amendments to the PIA when needed and when significant changes to the initiative are made.

6. Initiatives Involving the Storage of Personal Information Outside of Canada

6.1 Employees may not engage in any new or significantly revised initiative that involves the storage of personal information outside of Canada, until the privacy officer has completed and the head has approved a PIA and any required supplemental review.

6.2 The responsible employee or department may not enter into a binding commitment to participate in any initiative that involves the storage of personal information outside of Canada, unless any required supplemental review has been completed and approved by the head.

6.3 It is the responsibility of the privacy officer to determine whether a supplemental review is required in relation to any initiative, and to ensure that the supplemental review is completed in accordance with the requirements of *FIPPA*.

6.4 The privacy officer is responsible for reviewing, and if appropriate, approving all supplemental reviews, and in doing so must consider risk factors including:

6.4.1 the likelihood that the initiative will give rise to an unauthorized collection, use, disclosure, or storage of personal information;

6.4.2 the impact to an individual of an unauthorized collection, use, disclosure or storage of personal information;

6.4.3 whether the personal information is stored by a service provider;

6.4.4 where the personal information is stored; and

6.4.5 whether the supplemental review sets out mitigation strategies proportionate to the level of risk posed by the initiative.

6.5 Approval of a supplemental review by the head shall be documented in writing.

7. Inquiries

7.1 Questions or comments about these guidelines may be addressed to the privacy officer at privacy@sd38.bc.ca. The district will respond to all inquiries in writing.

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Related Acts and Regulation

School Act

British Columbia Freedom of Information and Protection of Privacy Act (FIPPA)

Supporting References, Policies, Procedures, and Forms

Policy 311 Freedom of Information and Protection of Privacy

Policy 311-R Privacy Management

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Adopted: 21 June 2023

Critical Incident and Privacy Breach Procedure

1. Purpose

The Board of Education of School District No. 38 (Richmond) (the dDistrict) is committed to ensuring the protection and security of all personal information within its control. That commitment includes responding effectively and efficiently to privacy breach incidents that may occur.

The purpose of these gGuidelines is to set out the dDistrict's process for responding to significant privacy breaches and to complying with its notice and other obligations under the *Freedom of Information and Protection of Privacy Act (FIPPA)*.

2. Scope & Responsibility

All eEmployees of the dDistrict are expected to be aware of and follow these gGuidelines in the event of a privacy breach. These gGuidelines apply to all eEmployees.

3. District Responsibilities

3.1 The sSuperintendent of sSchools is the "hHead" of the dDistrict for all purposes under the *FIPPA*.

3.2 The sSuperintendent has delegated the administration of these gGuidelines under *FIPPA* to the sSecretary-tTreasurer, who is the "pPrivacy oOfficer" of the dDistrict for all purposes under *FIPPA*.

3.3 The pPrivacy oOfficer is responsible to, in consultation with the hHead, ensure that all procedures are completed to respond to a privacy breach in accordance with the requirements of *FIPPA* and these gGuidelines.

4. Definitions

4.1 "**Employee(s)**" means the employees, contractors and volunteers of the dDistrict.;

4.2 "**FIPPA**" means the *British Columbia Freedom of Information and Protection of Privacy Act*, and regulations thereto.;

4.3 "**Guidelines**" means procedures enacted by the dDistrict under its pPolicy on Freedom of Information and Protection of Privacy.;

4.4 "**Head**" means the sSuperintendent of sSchools or any person to whom the sSuperintendent has delegated (in writing) their powers under these gGuidelines.;

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4.5 "**Personal Information**" means any recorded information about an identifiable individual that is within the control of the District, and district and includes information about any student or any employee of the district. Personal information does not include an individual's business contact information, such as business address, email address and telephone number, that would allow a person to be contacted at work.;

4.6 "**Privacy Breach**" means the theft or loss of or the collection, use or disclosure of personal information not authorized by *FIPPA*, 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.;

4.7 "**Privacy Officer**" means the Secretary-Treasurer who has been designated by the Head as privacy officer for the district.;

4.8 "**Records**" means books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or other mechanism that produces records.

5. Responsibilities of Employees

5.1 All employees must without delay report all actual, suspected or expected privacy breach incidents of which they become aware in accordance with these guidelines. All employees have a legal responsibility under *FIPPA* to report privacy breaches to the head.

5.2 Privacy breach reports may also be made to the privacy officer, who has delegated responsibility for receiving and responding to such reports.

5.3 If there is any question about whether an incident constitutes a privacy breach or whether the incident has occurred, employees should consult with the privacy officer.

5.4 All personnel must provide their full cooperation in any investigation or response to a privacy breach incident and comply with these guidelines for responding to privacy breach incidents.

5.5 Any employee who knowingly refuses or neglects to report a privacy breach in accordance with these guidelines may be subject to discipline, up to and including dismissal.

6. Privacy Breach Response

6.1 Step One – Report and Contain

6.1.1 Upon discovering or learning of a privacy breach, all employees shall:

1. Immediately report the privacy breach to the privacy officer.;

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2. Take any immediately available actions to stop or contain the pPrivacy bBreach, such as by:

   - isolating or suspending the activity that led to the pPrivacy bBreach; and
   - taking steps to recover pPersonal iInformation, rRecords, or affected equipment.

3. Preserve any information or evidence related to the pPrivacy bBreach in order to support the dDistrict's incident response.

6.1.2 Upon being notified of a pPrivacy bBreach, the pPrivacy oOfficer in consultation with the hHead, shall implement all available measures to stop or contain the pPrivacy bBreach. Containing the pPrivacy bBreach shall be the first priority of the pPrivacy bBreach response, and all eEmployees are expected to provide their full cooperation with such initiatives.

6.2 Step Two – Assessment and Containment

6.2.1 The pPrivacy oOfficer shall take steps to, in consultation with the hHead, contain the pPrivacy bBreach by making the following assessments:

1. the cause of the pPrivacy bBreach;
2. if additional steps are required to contain the pPrivacy bBreach, and, if so, to implement such steps as necessary;
3. identify the type and sensitivity of the pPersonal iInformation involved in the pPrivacy bBreach, and any steps that have been taken or can be taken to minimize the harm arising from the pPrivacy bBreach;
4. identify the individuals affected by the pPrivacy bBreach, or whose pPersonal iInformation may have been involved in the pPrivacy bBreach;
5. determine or estimate the number of affected individuals and compile a list of such individuals, if possible; and
6. make preliminary assessments of the types of harm that may flow from the pPrivacy bBreach.

6.2.2 The pPrivacy oOfficer, in consultation with the hHead, shall be responsible to, without delay, assess whether the pPrivacy bBreach could reasonably be expected to result in significant harm to individuals. (~~"**Significant Harm**").~~ That determination shall be made with consideration of the following categories of harm or potential harm:

1. bodily harm;
2. humiliation;

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3. damage to reputation or relationships;

4. loss of employment, business, or professional opportunities;

5. financial loss;

6. negative impact on credit record;

7. damage to, or loss of, property;

8. the sensitivity of the personal information involved in the privacy breach; and

9. the risk of identity theft.

6.3 Step Three – Notification

6.3.1 If the head determines that the privacy breach could reasonably be expected to result in significant harm to individuals, then the head shall make arrangements to:

1. report the privacy breach to the Office of the Information and Privacy Commissioner; and

2. provide notice of the privacy breach to affected individuals, unless the head determines that providing such notice could reasonably be expected to result in grave or immediate harm to an individual's safety or physical or mental health or threaten another individual's safety or physical or mental health.

6.3.2 If the head determines that the privacy breach does not give rise to a reasonable expectation of significant harm, then the head may still proceed with notification to affected individual if the head determines that notification would be in the public interest, or if a failure to notify would be inconsistent with the district's obligations or undermine public confidence in the district.

6.3.3 Determinations about notification of a privacy breach shall be made without delay following the privacy breach, and notification shall be undertaken as soon as reasonably possible. If any law enforcement agencies are involved in the privacy breach incident, then notification may also be undertaken in consultation with such agencies.

6.4 Step 4 - Prevention

6.4.1 The privacy officer in consultation with the head, shall complete an investigation into the causes of each breach incident reported under these guidelines, and shall implement measures to prevent recurrences of similar incidents.

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6.4.2 The pPrivacy oOfficer may suggest any necessary changes to operating procedures to prevent recurrence of similar pPrivacy bBreach incidents in the future as instructed by the hHead.

7. Inquiries

7.1 Questions or comments about these gGuidelines may be addressed to the pPrivacy oOfficer at privacy@sd38.bc.ca. The dDistrict will respond to all inquiries in writing.

Related Acts and Regulations:

School Act

British Columbia Freedom of Information and Protection of Privacy Act (FIPPA)

Supporting References, Policies, Procedures and Forms

Policy 311 Freedom of Information and Protection of Privacy

Policy 311-R Privacy Management

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Adopted: 21 June 2023

Personal Information Management Program

Purpose

As a public body that is subject to the *British Columbia Freedom of Information and Protection of Privacy Act* (the Act or *FIPPA*), the Board of Education of School District No. 38 (Richmond) (the district) is committed to upholding the principles of privacy, transparency, and accountability. This means that the district recognizes the fundamental importance of maintaining the privacy and security of the personal information that it collects, uses and discloses in the course of its operations and programs. The district also acknowledges and supports transparency with the community by facilitating access to district records and information in accordance with the requirements of the Act.

1. Definitions

1.1 **Consent** means express written consent to the collection, use or disclosure of personal information.

1.2 **Employees** means the employees, contractors, and volunteers of the district.

1.3 **FIPPA** means the *British Columbia Freedom of Information and Protection of Privacy Act*, and regulations.

1.4 **Head** means the superintendent of schools, or any person to whom the superintendent has delegated (in writing) their powers under these guidelines.

1.5 **Privacy Officer** means the secretary-treasurer who has been designated by the head as the privacy officer for the district.

1.6 **Personal Information** means any recorded information about an identifiable individual that is within the control of the district and includes information about any student or any employee of the district. Personal information does not include an individual's business contact information, such as business address, email address, and telephone number, that would allow a person to be contacted at work.

1.7 **Guidelines** means procedures enacted by the district under its policy on Freedom of Information and Protection of Privacy.

1.8 **Records** means books, documents, maps, drawings, photographs, letters, vouchers, papers, and any other thing on which information is recorded or stored by graphic, electronic, mechanical, or other means, but does not include a computer program or other mechanism that produces records.

2. Principles

2.1 Employees are responsible for:

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- making reasonable efforts to familiarize themselves with these guidelines and the requirements of *FIPPA*, including by participating in privacy training initiatives offered by the district;

- following responsible information management practices to ensure that the district collects, uses, and discloses personal information in compliance with *FIPPA* and other applicable laws;

- seeking at all times to protect personal information against unauthorized collection, use and disclosure, including by limiting the sharing of sensitive personal information on a need to know basis;

- cooperating with district guidelines to facilitate the appropriate release of records within its custody or control in response to access requests received from members of the community under *FIPPA*;

- cooperating with district guidelines for the completion of privacy impact assessments; and

- reporting privacy breaches to the district in accordance with the district's guidelines.

3. Accountability

3.1 The superintendent of schools is the head of the district for all purposes under the *FIPPA*.

3.2 The superintendent has delegated the administration of these guidelines under *FIPPA* to the secretary-treasurer, who is the privacy officer of the district for all purposes under *FIPPA*.

3.3 The head is responsible to appoint, oversee, and if appropriate, delegate responsibility to the privacy officer for the district to supervise its personal information management program.

4. Commitment to Privacy Protection

4.1 The district protects the privacy of students, employees, and individuals whose personal information it collects, uses, shares, and retains, and expects all employees to follow responsible information management practices to ensure that the district fully complies with its obligations under *FIPPA* and other applicable laws.

4.2 The district and employees respect the privacy and confidentiality of personal information entrusted to them in the course of their duties, and collects, uses, and discloses personal information only where authorized by *FIPPA*.

5. Purposes for Collecting Personal Information

5.1 The district communicates the purposes for which personal information is collected at or before the time the information is collected, unless otherwise permitted or required by *FIPPA*.

5.2 In the ordinary course of carrying out its programs and activities, the district collects personal information of its students for purposes including:

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- registration, enrollment, and transfer of students;
- to provide and deliver educational programs and services;
- to accommodate students with disabilities and diverse abilities;
- to communicate with students and respond to inquiries or complaints;
- to prepare and provide assessments of student performance;
- to supervise and ensure the safety and security of the district (such as through the use of video surveillance);
- to investigate and respond to accidents, safety events, misconduct, and similar incidents;
- to ensure compliance with applicable district bylaws, policies, and other laws;
- to make all required reports and filings to the Ministry of Advanced Education; and
- for other purposes set out in these guidelines or required under applicable laws.

5.3 In the ordinary course of carrying out its employment programs and activities, the district collects the personal information of prospective, current, and former employees for purposes including:

- hiring and recruitment;
- to manage and administer the employment relationship;
- to communicate with authorized union representatives;
- to administer employment compensation and benefits;
- to evaluate performance and manage disciplinary incidents;
- to supervise and ensure the safety and security of the district (such as through the use of video surveillance);
- to investigate and respond to accidents, safety events, misconduct, and similar incidents;
- to ensure compliance with applicable district policies and other applicable laws; and
- for other purposes set out in these guidelines or required under applicable laws.

6. Collection, Use and Disclosure Of Personal Information

6.1 The district limits the collecting of personal information to what is related to and necessary in order to carry out its programs and activities or for other purposes authorized by *FIPPA*.

6.2 The district seeks to collect personal information by fair, lawful, and transparent means, including by collecting personal information directly from the individual, except where otherwise authorized by *FIPPA*.

6.3 The district seeks to inform individuals from whom it collects personal information, the purposes for which the information is being collected, the legal authority for collecting it, and the name and contact information of someone at the district who can answer questions about the collection and use of the information;

6.4 The district limits the internal and external use and sharing of personal information to what is required and authorized by *FIPPA* or consented to by the individual.

6.5 The district only uses or discloses personal information for the purpose for which it was collected, except with the individual's consent or as otherwise required or permitted by *FIPPA* or other laws.

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7. Securing Personal Information

7.1 The district protects personal information by ensuring it has reasonable security safeguards in place which are appropriate to the sensitivity of the information. Such security safeguards shall include consideration of physical security, organizational security, and electronic security.

7.2 All employees have a duty to protect the privacy and security of personal information collected and used by them as part of their ongoing employment responsibilities, including by complying with the terms of these guidelines, and all related guidelines.

7.3 The district provides training to all employees to ensure they have the requisite knowledge to ensure compliance with the terms of these guidelines and the *FIPPA*.

8. Retention

8.1 The district does not seek to retain personal information longer than necessary to satisfy the district's applicable operational, instructional, financial, and legal needs.

8.2 Personal information that is no longer required for either administrative, operational, financial, legal, or historical purposes shall be securely destroyed in a confidential manner in accordance with district policies and approved record retention protocols.

9. Accuracy and Correction

9.1 The district shall make reasonable efforts to ensure the accuracy of the personal information that they collect and use in the course of performing their duties.

9.2 Individuals have the right to request the correction of their personal information, and the district will receive and respond to such requests in accordance with the *FIPPA* and district guidelines.

10. Access to Information

10.1 The district supports appropriate transparency and accountability in its operations by making information available to the public as permitted or required under *FIPPA*.

10.2 The head shall, on at least an annual basis, consider and designate categories of records that will be made available to the public without the need to make a request in accordance with *FIPPA*.

10.3 The district recognizes that individuals may make requests for access to records within the custody and control of the district, and the district will respond to such requests in accordance with *FIPPA* and these guidelines.

10.4 The district recognizes that individuals have a right to access their own personal information within the custody and control of the district, and will facilitate such access in accordance with the requirements of *FIPPA.*

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11. Inquiries

11.1 Questions or comments about these guidelines may be addressed to the privacy officer at privacy@sd38.bc.ca. The district will respond to all inquiries in writing.

Related Acts and Regulations:

School Act

British Columbia Freedom of Information and Protection of Privacy Act (FIPPA)

Supporting References, Policies, Procedures, and Forms

Policy 311 Freedom of Information and Protection of Privacy

Policy 311-R Privacy Management

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Adopted: 21 June 2023

Personal Information Management Program

Purpose

As a public body that is subject to the *British Columbia Freedom of Information and Protection of Privacy Act* (the "Act" or *FIPPA*"), the Board of Education of School District No. 38 (Richmond) (the d"District") is committed to upholding the principles of privacy, transparency, and accountability. This means that the dDistrict recognizes the fundamental importance of maintaining the privacy and security of the personal information that it collects, uses and discloses in the course of its operations and programs. The dDistrict also acknowledges and supports transparency with the community by facilitating access to dDistrict records and information in accordance with the requirements of the Act.

1. Definitions

1.1 "**Consent**" means express written consent to the collection, use or disclosure of personal information.;

1.2 "**Employee(s)**" means the employees, contractors, and volunteers of the dDistrict.;

1.3 "**FIPPA**" means the *British Columbia Freedom of Information and Protection of Privacy Act*, and regulations thereto.;

1.4 "**Head**" means the sSuperintendent of sSchools, or any person to whom the sSuperintendent has delegated (in writing) their powers under these gGuidelines.;

1.5 "**Privacy Officer**" means the sSecretary-tTreasurer who has been designated by the hHead as the pPrivacy oOfficer for the dDistrict.;

1.6 "**Personal Information**" means any recorded information about an identifiable individual that is within the control of the dDistrict and includes information about any student or any eEmployee of the dDistrict. Personal iInformation does not include an individual's business contact information, such as business address, email address, and telephone number, that would allow a person to be contacted at work.;

1.7 "**Guidelines**" means procedures enacted by the dDistrict under its pPolicy on Freedom of Information and Protection of Privacy.;

1.8 "**Records**" means books, documents, maps, drawings, photographs, letters, vouchers, papers, and any other thing on which information is recorded or stored by graphic, electronic, mechanical, or other means, but does not include a computer program or other mechanism that produces records.

2. Principles

2.1 Employees are responsible for:

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- making reasonable efforts to familiarize themselves with these gGuidelines and the requirements of *FIPPA*, including by participating in privacy training initiatives offered by the dDistrict;

- following responsible information management practices to ensure that the dDistrict collects, uses, and discloses pPersonal iInformation in compliance with *FIPPA* and other applicable laws;

- seeking at all times to protect pPersonal iInformation against unauthorized collection, use and disclosure, including by limiting the sharing of sensitive pPersonal iInformation on a need to know basis;

- cooperating with dDistrict gGuidelines to facilitate the appropriate release of rRecords within its custody or control in response to access requests received from members of the community under *FIPPA*;

- cooperating with dDistrict gGuidelines for the completion of privacy impact assessments; and

- reporting privacy breaches to the dDistrict in accordance with the dDistrict's gGuidelines.

3. Accountability

3.1 The sSuperintendent of sSchools is the h"Head" of the dDistrict for all purposes under the *FIPPA*.

3.2 The sSuperintendent has delegated the administration of these gGuidelines under *FIPPA* to the sSecretary-tTreasurer, who is the p"Privacy oOfficer" of the dDistrict for all purposes under *FIPPA*.

3.3 The hHead is responsible to appoint, oversee, and, if appropriate, delegate responsibility to the pPrivacy oOfficer for the dDistrict to supervise its pPersonal iInformation management program.

4. Commitment to Privacy Protection

4.1 The dDistrict protects the privacy of students, eEmployees, and individuals whose pPersonal iInformation it collects, uses, shares, and retains, and expects all eEmployees to follow responsible information management practices to ensure that the dDistrict fully complies with its obligations under *FIPPA* and other applicable laws.

4.2 The dDistrict and eEmployees respect the privacy and confidentiality of pPersonal iInformation entrusted to them in the course of their duties, and collects, uses, and discloses pPersonal iInformation only where authorized by *FIPPA*.

5. Purposes for Collecting Personal Information

5.1 The dDistrict communicates the purposes for which pPersonal iInformation is collected at or before the time the information is collected, unless otherwise permitted or required by *FIPPA*.

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5.2 In the ordinary course of carrying out its programs and activities, the dDistrict collects pPersonal iInformation of its students for purposes including:

- registration, enrollment, and transfer of students;
- to provide and deliver educational programs and services;
- to accommodate students with disabilities and diverse abilities~~special needs~~;
- to communicate with students and respond to inquiries or complaints;
- to prepare and provide assessments of student performance;
- to supervise and ensure the safety and security of the dDistrict (such as through the use of video surveillance);
- to investigate and respond to accidents, safety events, misconduct, and similar incidents;
- to ensure compliance with applicable dDistrict bylaws, policies, and other laws;
- to make all required reports and filings to the Ministry of Advanced Education; and
- for other purposes set out in these gGuidelines or required under applicable laws.

5.3 In the ordinary course of carrying out its employment programs and activities, the dDistrict collects the pPersonal iInformation of prospective, current, and former eEmployees for purposes including:

- hiring and recruitment;
- to manage and administer the employment relationship;
- to communicate with authorized union representatives;
- to administer employment compensation and benefits;
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- for other purposes set out in these gGuidelines or required under applicable laws.

6. Collection, Use and Disclosure Of Personal Information

6.1 The dDistrict limits the collecting of pPersonal iInformation ~~it collects to information~~ to what is related to and necessary in order to carry out its programs and activities or for other purposes authorized by *FIPPA*.

6.2 The dDistrict seeks to collect pPersonal iInformation by fair, lawful, and transparent means, including by collecting pPersonal iInformation directly from the individual, except where otherwise authorized by *FIPPA*.

6.3 The dDistrict seeks to inform individuals from whom it collects pPersonal iInformation, the purposes for which the information is being collected, the legal authority for collecting it, and the name and contact information of someone at the dDistrict who can answer questions about the collection and use of the information;

6.4 The dDistrict limits the internal and external use and sharing of pPersonal iInformation to what is required and authorized by *FIPPA* or consented to by the individual.

6.5 The dDistrict only uses or discloses pPersonal iInformation for the purpose for which it was collected, except with the individual's consent or as otherwise required or permitted by *FIPPA* or other laws.

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7. Securing Personal Information

7.1 The dDistrict protects pPersonal iInformation by ensuring it has reasonable security safeguards in place which are appropriate to the sensitivity of the information. —Such security safeguards shall include consideration of physical security, organizational security, and electronic security.

7.2 All eEmployees have a duty to protect the privacy and security of pPersonal iInformation collected and used by them as part of their ongoing employment responsibilities, including by complying with the terms of these gGuidelines, and all related gGuidelines.

7.3 The dDistrict provides training to all eEmployees to ensure they have the requisite knowledge to ensure compliance with the terms of these gGuidelines and the *FIPPA*.

8. Retention

8.1 The dDistrict does not seek to retain pPersonal iInformation longer than necessary to satisfy the dDistrict's applicable operational, instructional, financial, and legal needs.

8.2 Personal information that is no longer required for either administrative, operational, financial, legal, or historical purposes shall be securely destroyed in a confidential manner in accordance with dDistrict policies and approved record retention protocols.

9. Accuracy and Correction

9.1 The dDistrict shall make reasonable efforts to ensure the accuracy of the pPersonal iInformation that they collect and use in the course of performing their duties.

9.2 Individuals have the right to request the correction of their pPersonal iInformation, and the dDistrict will receive and respond to such requests in accordance with the *FIPPA* and dDistrict gGuidelines.

10. Access to Information

10.1 The dDistrict supports appropriate transparency and accountability in its operations by making information available to the public as permitted or required under *FIPPA*.

10.2 The hHead shall, on at least an annual basis, consider and designate categories of rRecords that will be made available to the public without the need to make a request in accordance with *FIPPA*.

10.3 The dDistrict recognizes that individuals may make requests for access to rRecords within the custody and control of the dDistrict, and the dDistrict will respond to such requests in accordance with *FIPPA* and these gGuidelines.

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11. Inquiries

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Adopted: 21 June 2023

Personal Information Management Program

Purpose

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2. Principles

2.1 Employees are responsible for:

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- making reasonable efforts to familiarize themselves with these guidelines and the requirements of *FIPPA*, including by participating in privacy training initiatives offered by the district;

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3. Accountability

3.1 The superintendent of schools is the head of the district for all purposes under the *FIPPA*.

3.2 The superintendent has delegated the administration of these guidelines under *FIPPA* to the secretary-treasurer, who is the privacy officer of the district for all purposes under *FIPPA*.

3.3 The head is responsible to appoint, oversee, and if appropriate, delegate responsibility to the privacy officer for the district to supervise its personal information management program.

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7. Securing Personal Information

7.1 The district protects personal information by ensuring it has reasonable security safeguards in place which are appropriate to the sensitivity of the information. Such security safeguards shall include consideration of physical security, organizational security, and electronic security.

7.2 All employees have a duty to protect the privacy and security of personal information collected and used by them as part of their ongoing employment responsibilities, including by complying with the terms of these guidelines, and all related guidelines.

7.3 The district provides training to all employees to ensure they have the requisite knowledge to ensure compliance with the terms of these guidelines and the *FIPPA*.

8. Retention

8.1 The district does not seek to retain personal information longer than necessary to satisfy the district's applicable operational, instructional, financial, and legal needs.

8.2 Personal information that is no longer required for either administrative, operational, financial, legal, or historical purposes shall be securely destroyed in a confidential manner in accordance with district policies and approved record retention protocols.

9. Accuracy and Correction

9.1 The district shall make reasonable efforts to ensure the accuracy of the personal information that they collect and use in the course of performing their duties.

9.2 Individuals have the right to request the correction of their personal information, and the district will receive and respond to such requests in accordance with the *FIPPA* and district guidelines.

10. Access to Information

10.1 The district supports appropriate transparency and accountability in its operations by making information available to the public as permitted or required under *FIPPA*.

10.2 The head shall, on at least an annual basis, consider and designate categories of records that will be made available to the public without the need to make a request in accordance with *FIPPA*.

10.3 The district recognizes that individuals may make requests for access to records within the custody and control of the district, and the district will respond to such requests in accordance with *FIPPA* and these guidelines.

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11.1 Questions or comments about these guidelines may be addressed to the privacy officer at privacy@sd38.bc.ca. The district will respond to all inquiries in writing.

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Policy 311 Freedom of Information and Protection of Privacy

Policy 311-R Privacy Management

DRAFT

Adopted: 21 June 2023

Terminology in Indigenous content

(taken from the Ministry's Website)

Individuals and Nations may have preferred terminology. Always check first with those you're writing about.

Last updated: **October 6, 2023**

Aboriginal

Legal term in Canada when referring to Aboriginal rights under s.35 of the Constitution Act, 1982.

Band Councils

Use this term only to describe leadership operating under the Indian Act. The term may not be appropriate when self-government agreements such as treaties are in place. Review the Profile of Indigenous Peoples to learn more about the government structure of a Nation.

British Columbians

The term 'British Columbians' is often used to reference people living in B.C. This term excludes Indigenous Peoples who may not identify with it. For many, they identify as members of their own sovereign nations and do not consider themselves part of one that has actively worked to assimilate their people.

'British Columbians' also excludes other groups such as newcomers and refugees. We recommend instead saying 'people living in B.C.'

First Nation(s)

- Identifies one of the three populations of Indigenous Peoples within Canada, the other two being Métis and Inuit
- An individual's heritage which can be a combination of any or all three
- Usually, the term 'First Nations' is plural when used as an adjective and singular or plural as a noun
- First Nations people identify with their ancestral Indigenous origins and do not like to have their identity tied to the federally regulated reserve status, which is a colonial construct through the Indian Act
- Many First Nation communities in Canada are still governed by the Indian Act, and are referred to as Bands
- First Nation refers to the political governance entity and is made up of members of the First Nation community

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Hereditary Chiefs

Hereditary Chiefs inherit their title. Their responsibilities and governing principles are according to the history and cultural values of their community. Hereditary Chiefs are the caretakers of the people and the culture. In addition to governance responsibilities, they may carry or share the responsibility of ensuring the traditions, protocols, songs, and dances of the community are respected and kept alive.

Indigenous

- The term 'Indigenous Peoples' includes First Nations, Inuit and Métis people in Canada
- Although used as a synonym to Aboriginal, Indigenous is the preferred term
- Individuals are more likely to identify with their Nation than the term Indigenous

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Inuit and Inuk

- Indigenous people who live in the Arctic regions of what is now Canada, Greenland, United States of America and Siberia
- Identifies one of the three populations of Indigenous Peoples within Canada, the other two being First Nations and Métis
- Inuit in Canada are part of the Indian Act and at the same time do not have 'status'. They have their own history of land claims and journey of returning to self-governance
- Inuit in B.C. do not currently have political representation within B.C.
- Inuit – plural, 'we're Inuit'
- Inuit - adjective or collective noun. For example:
    - 'No matter where Inuit live, whether in Nunavut or elsewhere, they share certain ideals, beliefs and ways of life.'[1]
    - 'An Inuit drum'
- Inuk - singular noun referring to an individual. 'This Inuk is a celebrated Inuit musician' is correct, but not 'The musician is an Inuk' or 'They're an Inuk musician'

Métis

- Indigenous peoples with ancestral lineage that can be traced back to the historic Métis Nation Homeland which includes Manitoba, Saskatchewan, and Alberta, as well as parts of Ontario, British Columbia, the Northwest Territories and parts of the northern United States.
- Identifies one of the three populations of Indigenous Peoples within Canada, the other two being First Nations and Inuit
- Nation-specific term with unique culture, language and customs
- Can be singular or plural, noun or adjective
- Métis people possess both First Nations and European ancestry. However, not all people with mixed First Nations and European ancestry are Métis.
- The Métis National Council (MNC), the political organization that represents the Métis Nation federally, defined Métis in 2002 as: "a person who self-identifies as Métis, is distinct from other Aboriginal peoples, is of historic Métis Nation ancestry and who is accepted by the Métis Nation"

Reserve

Lands defined under the Indian Act and held in trust by the Crown. Note that the term ‘reservation’ is used in the United States only.

Rights

Asserted or established rights as referred to under Section 35 of the Constitution and Nation-specific Treaties.

Poles and Posts

‘Totem pole’ is a general term, not all Nations have them. There are different types of poles, statutory figures and posts. Other names for Totem poles can be translated as Clan or House totems. These identify the Clan or Wilp (Gitxsan for House group) that protects and uses the land in that totem’s territory. Traditionally this allowed others to identify the People whose territory they were moving through. It also identified who to ask for permission to use the land for themselves for a time. For example, when they need to hunt/harvest to get a stock of food to keep travelling. Speak with the Nation, Elder, Knowledge Keeper or other knowledgeable individual from the Nation about what kind of pole or post is being discussed and its purpose and history.

Stakeholders

‘Stakeholder‘ is a common corporate term for partners which has negative connotations to many Indigenous Peoples. When land acquisition was happening, this term referred to the allotment of land to settlers. Settlers were given wooden stakes to claim their plot of land prior to any treaty or land negotiations with Indigenous Peoples. It's more appropriate to refer to Indigenous Peoples as partners rather than stakeholders. Indigenous Peoples are not stakeholders;

they're Aboriginal rights holders whose rights are protected under the Constitution of Canada.

Territory

Territories that Nations have occupied and continue to occupy where they exercise their Indigenous rights.

Treaty Settlement Lands

Lands identified under a treaty over which a First Nation has law-making authority and title.

Two-spirit

Two-spirit people are part of the LGBTQ2S+ community, specific to the Indigenous community. The term ‘Two-spirit’ can be abbreviated as ‘2S.’ An older term, ‘Two-spirited’ may be preferred by some people when referring to themselves.

UN Declaration on the Rights of Indigenous Peoples

When shortening the name of the United Nations Declaration on the Rights of Indigenous Peoples, it's the preference to use the term UN Declaration, and not the acronym UNDRIP.

Outdated terms to avoid

Avoid outdated terms unless they're formalized in organizational, geographical names, or legislation.

- Aboriginal groups
- Aboriginal interest
- Band (Unless referring to a local Nation that uses this term, check with the Nation first for proper reference)
- Eskimo
- Indian (Unless referring to a local Nation that uses this term, such as 'Adams Lake Indian Band'. Or it is part of legislation like the 'Indian Act' or 'Status Indian')
- Native (Unless it is part of an organization name such as 'Native Women's Association of Canada')
- Traditional (i.e. traditional knowledge, traditional territories, makes it seem like it is only applicable to the past and not the present.) When referring to ceremonies, please check with the local Nation's website for assistance on whether to include 'traditional'.
- Tribe (Unless referring to a local Nation that uses this term, such as 'Cowichan Tribes'. 'Tribe' may also be appropriate when working with groups or individuals in the U.S.A.)

Offer context where possible when using the terms listed above, such as, 'Status Indian under the Indian Act'.

Be mindful of the words you're using

Some words have historical connotations which may cause unease or mistrust. Awareness of this historical lens is important when working with Indigenous Peoples. For example:

- 'Executing' and 'execute' are commonly used and can be replaced with 'implement.' Consider that in 1864, the provincial government asked to meet the Tsilhqot'in Chiefs and then hanged five of them on October 25, 1864, at a location just north of Quesnel's hospital.

- ‘Artifact(s)’ and ‘curating/curate’ are commonly used when describing documents or the work done to compile information. When used out of context it has negative connotations to many Indigenous Peoples. Indigenous communities struggle to reclaim cultural and ceremonial regalia, artwork and tools which were stolen and are displayed publicly or privately. In some cases, there are pieces that were never meant to be seen outside of ceremony and they continue to hang in a museum or a private collection not being honored and cared for by their rightful owners. Using the word(s) out of context sounds like something is being taken, e.g. data, knowledge, ideas, and used without the permission of Indigenous Peoples.

Be curious of the influence of our words. Choose language that reflects consent and Indigenous agency and resiliency. For example:

- ‘Leverage’ instead of ‘take advantage’
- ‘Practice’ instead of ‘use’

Many words can support a positive shift. For example:

- ‘Should’ may be replaced with ‘could’
- ‘But’ may be replaced with ‘and’
- ‘Best’ may be replaced with ‘wise’
- ‘Gaps’ may be replaced with ‘needs’

RICHMOND
SCHOOL DISTRICT NO.38

Checklist for Policy, Regulations and Guidelines Revision and Development

This checklist is designed to be used by those with responsibility for developing and revising School District 38 Policies, Regulations and Guidelines to ensure that all SD38 Policies, Regulations and Guidelines are written and revised with diversity, equity and inclusion principles in mind. The checklist is organized into two sections; Structure and Organization, and Content.

Policy, Regulations and Guidelines Structure and Organization

The Policy/Regulations/Guidelines include the following;	Yes	No	Notes (especially where yes/no is not clear)
The language is accessible to readers through use of plain language and a glossary of terms that is linked for ease of access			
If background information, or knowledge of another policy, regulation or guideline is required to understand it, it is linked			
The following is clear, identifiable and marked with a heading; • title • number • purpose of the policy, regulation or guideline • implementation procedures			
This policy, regulation or guideline has text features such as; • headings • flow charts • bullet points • other visuals that support its readability. If a visual is used it is prominent (ie near the top of the document rather than at the bottom), and includes links to relevant sections of the document			
If other documents or policies are referenced, they are linked			
When an acronym is used, it is defined			
A link to accessibility features such as voiceover, and translation is provided			

RICHMOND
SCHOOL DISTRICT NO.38

Policy, Regulations and Guidelines Content			
The Policy, Regulation or Guideline includes the following;	Yes	No	Notes (especially where yes/no is not clear)
The language uses inclusive terminology and is gender inclusive			
The intention is clear			
It is specific			
Applicable guidelines and regulations are linked throughout the document			
The policy, regulation or guideline promotes diversity, equity and inclusion as referenced in Strategic Priority 2			
The policy, regulation or guideline is aligned with DRIPA (Declaration on the Rights of Indigenous Peoples Act) and TRC (Truth and Reconciliation Commission) Calls to Action			
The policy, regulation or guideline is aligned with the District's strategic priorities			
The policy, regulation or guideline is consistent with relevant legislation			
If the policy, regulation or guideline builds on other legislation, such as the School Act, Human Rights Code, etc. this is noted and linked			
The policy, regulation or guideline has gone through specific and equitable consultation processes with partner groups, and affected communities as applicable. A link to Policy 204-R is provided regarding the feedback process			
It is clear who is responsible for implementing this policy, regulation or guideline			
A description of the process for implementation is included			

This checklist is to be reviewed on a periodic basis to ensure it stays current and relevant.

POLICY COMMITTEE: STATUS OF CURRENT AND ANTICIPATED ITEMS

COMPLETED		
	Policy	**Dates & Actions**
1	**Policy 101:** Goals and Objectives	Revised policy approved in May 2023
2	**Policy 201:** Board Operations	Revised policy approved in June 2023
3	**Policy 311/311-R:** Freedom of Information and Protection of Privacy	New policy approved in June 2023
4	**Policy 621/621-R:** Financial Planning and Reporting and **Policy 631-R:** Accumulated Operating Surplus and Capital Reserves	Revised policy approved in June 2023
5	**Policy 402/402-R:** Public Interest Disclosure Policy	New policy approved in December 2023
6	**Policy 701.2-R:** Capital Project Design Review Process	Revised policy approved in March 2024
7	**Policy 200:** Trustee Role, Responsibilities and Code of Ethics	Revised policy approved in May 2024
8	**Policy 204-R:** Creation and Revision of Policy and Regulations	Revised policy approved in May 2024
9	**Policy 105: District Code of Conduct**	Revised policy approved in June 2024
10	**Policy 203-R/203-G:** Trustee Stipend and Expenses	Revised policy approved in October 2024
11	**Policy 400-R5:** Smoking and Alcohol Consumption **Policy 804.1-R:** Community Use of District Facilities	Revised policies approved in October 2024
12	**Policy Refresh:** **Policy 101/101-R: Strategic Planning**	Updated policies approved in December 2024
13	**Policy Refresh:** **Policy 103:** Collaboration and Community **Policy 103-R (A):** Foundations for Learning **Policy 103-R (B):** Complaints and Appeals by Staff	Updated policies approved in February 2025
14	**Policy Refresh:** **Policy 105/105-R:** District Code of Conduct	Updated policy approved in March 2025
15	**Policy 102:** Diversity and Inclusion	Revised policy approved in May 2025

Updated to June 9, 2025

POLICY COMMITTEE: STATUS OF CURRENT AND ANTICIPATED ITEMS

COMPLETED		
	Policy	**Dates & Actions**
16	**Policy 103 Bylaw:** Complaints by Students, Parents & the Public	Revised policy approved in May 2025

IN PROGRESS		
	Policy	**Dates & Actions**
1	**Policy 201 Bylaw:** Board Operations **Senior Staff Responsible:** Cindy Wang	• Public report on draft revised policy with Recommendation for Notice of Motion for approval at May board meeting • For final approval in June board meeting
2	**Policy Refresh:** **Policy 311/311-R:** Freedom of Information and Protection of Privacy **Policy 311-G (A):** Privacy Impact Assessments **Policy 311-G (B):** Critical Incident and Privacy Breach Procedure **Polciy 311-G (C):** Personal Information Management Program	• Public report on draft updated policy with Recommendation for Notice of Motion for approval at June board meeting (June 2025)

ANTICIPATED		
	Policy	**Dates & Actions**
1	**Policy 105-R:** a. District Code of Conduct: How We Learn and Work Together b. Respect for Personal Public Property and Environment (i.e., District Facilities, Equipment) – **Senior Staff Responsible**: Cindy Wang	• Review after completion of the new strategic plan • Public report on draft revised policy (Feb 2021) - Committee agreed that there would be more discussion and review around process for the revision to be brought back at a later date

Updated to June 9, 2025

POLICY COMMITTEE: STATUS OF CURRENT AND ANTICIPATED ITEMS

ANTICIPATED		
	Policy	**Dates & Actions**
2	**Student Behaviour Policies** **a. Policy 502:** Student Behaviour and Discipline **b. Policy 502.1:** Maintenance of Orderly Conduct **c. Policy 502.2/502.2-R:** Student Suspension or Exclusion from School **d. Policy 502.3/502.3-R:** Student Possession of Weapons **Senior Staff Responsible:** Braunwyn Thompson	• Update provided by Deputy Superintendent. Policies and regulations will be updated in with District Code of Conduct and brought back to the Committee for further review and feedback (Jan 2021) • Anticipate submission of revised policy to public meeting in 2025
3	**Policy 522/522-R:** Transportation **Senior Staff Responsible:** Cindy Wang/Christel Brautigam	• Anticipate submission of revised policy to public meeting in 2025
4	**Policy 701.11/701.11-R:** Naming and Renaming of Board Owned Facilities or Parts of Board Owned Facilities **Policy 701.12/701.12-G:** Official School Openings **Senior Staff Responsible:** Christopher Usih	• Update for information from the Deputy Superintendent (Mar 2022) • Policy revision and development **placed on hold** to allow for the Anti-Racism Working Group Report to the Board • Policy 102 will be reviewed/refreshed to inform and ensure alignment with a redrafted Policy 701.11/701.11-R

POLICY COMMITTEE: STATUS OF CURRENT AND ANTICIPATED ITEMS

ANTICIPATED		
	Policy	**Dates & Actions**
5	**PHASE 3 - Policy Section 700: Facilities** Policy 703.1 - Accident Prevention and Safety Procedure Policy 703.2 - First Aid and Accident Reports Policy 703.5 and Regulation 703.5-R - Health and Safety Policy 703.6 and Regulation 703.6-R - Protection of Employees from Violence in the Workplace Policy 705 and Regulation 705-R - Telephones Policy 706 - Smoke Free Environments Policy 703.7 and Regulation 703.7-R - Closure of Schools Due to Emergent Conditions Policy 707 and Regulation 707-R - Post Disaster Procedures Policy 708 and Regulation 708-R - Video Surveillance **Senior Staff Responsible:** Cindy Wang	• Policy revision **placed on hold** (Feb 2025) – for future consideration