

My School Co-operative Nursery School

Privacy Policy Statement

Privacy of personal information is an important principle to My School Co-operative Nursery School. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. We also try to be open and transparent as to how we handle personal information. This document describes our privacy policies.

1. What is Personal Information?

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics, (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health, (e.g., health history, health conditions, health services received by them), or their activities and views, (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is to be contrasted with business information, (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

2. Who We Are

My School is a non-profit co-operative whose mandate is to provide a quality program for children in a nurturing environment. The corporation is governed by a volunteer Board of Directors who has appointed a Director/Privacy Officer to carry out the mandate.

We partner with a number of agencies and support workers that may in the course of their duties have limited access to personal information we hold. (I.e. accounting auditors, supply staff). The Ministry of Education in the course of their duties to ensure compliance with the Child Care and Early Years Act will have access to personal information we hold. The Regional Municipality of Toronto Health Inspections Department, in the course of their duties to ensure compliance with the Child Care and Early Years Act, will have access to and collect personal information we hold.

We limit their access to any personal information we hold based on the legislative requirements and their authority to collect. We also have their assurance that they follow appropriate privacy principles.

We Collect Personal Information: Primary Purposes

3. About Clients

As licensed providers of childcare we collect, use and disclose personal information in order to better serve our clients. For our clients, the primary purpose for collecting information is to provide the best childcare possible, adequately meeting the needs of the children and families.

A second primary purpose is to meet the legislative requirements of the Child Care and Early Years Act.

A third primary purpose to collect the necessary personal information is so that we can contact the appropriate people in the event of an emergency.

It would be rare for us to collect or disclose any personal information without the client's express consent, but this might occur in a case of urgency, (e.g., parent or guardian is unavailable), or where we believe the client would consent if asked and it is impractical to obtain consent, (e.g. a child's well being is at risk).

Member names, addresses and phone numbers are included on our Membership Lists, which are circulated to all current members and staff. Should you not wish your information to be included, please inform your privacy officer or the registrar.

Permission/consent forms are provided to families prior to disclosing information about a child, unless the well being of the child is at risk or a legislatively mandated program seeks information, (e.g. FACS).

A consent form is signed at registration time to allow the taking of photographs of children in the school

4. About Board of Directors Members

The primary purpose for collecting information is to allow for the distribution of relevant information to allow them to fulfill their responsibilities as Board Members.

A secondary purpose for us to collect personal information is to complete necessary reporting documents to Revenue Canada and the Ministry of Education for licensing purposes.

5. About Staff

For staff our primary purpose for the collection of personal information is to complete payroll, provide benefits to employee and dependants, contact staff, etc.

The second primary purpose is to meet the legislative requirements and ensure the well being of the clients and workforce.

6. About Contract Staff

For people who are contracted to do work for us, (e.g., supply staff), our primary purpose for collecting personal information is to ensure we can contact them in the future, (e.g., for new assignments), and for necessary work related communication, (e.g., sending out pay cheques, payment for services). Examples of the type of personal information we collect for those purposes include home addresses and

telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of health emergency, (e.g., an outbreak of a contagious disease), or to investigate a possible breach of law, (e.g., if a theft were to occur in the school

Protecting Personal Information

We understand the importance of protecting personal information. For that reason we have taken the following steps:

Paper information is either under supervision or secured in a locked or restricted area.

Electronic hardware is either under supervision or secured in a locked or restricted area at all times.

Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.

Retention and Destruction of Personal Information

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory and legislative bodies. However we do not want to keep personal information too long in order to protect your privacy.

We keep our member files for two years after the family withdraws from our school. Financial records are kept for seven years. Employee files are kept for five years after termination of employment.

We destroy paper files that contain personal information. We destroy electronic information by deleting it, and when the hardware is discarded, we ensure that the hard drive is formatted to erase any information contained within.

You Can Look at Your Information

With some exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you.

If there is a problem, we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

If you believe there is a mistake in the information, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have formed. We may ask you to provide documentation that our files are wrong. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you on the point.

Do You Have a Question?

Please contact our Vice President/ Privacy Officer as listed on the My School Board members list. She/he will attempt to answer any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Privacy Officer. She/he will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

This policy is made under the Personal Information Protection and Electronic Documents Act. It is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above.

For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

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