



POLICY COMMITTEE OF THE WHOLE - AGENDA

MONDAY, JUNE 19, 2023
1:00 P.M.
via Zoom

Facilitator: Trustee Carol Kellogg

Join Zoom Meeting

<https://sd69-bc-ca.zoom.us/j/67663447902?pwd=U1ltRU5jYitzSml2OHFBckVmeVhpZz09>

Meeting ID: 676 6344 7902

Passcode: 274668

Mandate: To discuss and make recommendations to the Board on all matters related to Bylaws, Policy, Administrative Procedures.

AGENDA

We would like to give thanks and acknowledge that the lands on which we work and learn are on the shared traditional territory of the Qualicum and Snaw-Naw-As (Nanoose) First Nations People.

1. **INTRODUCTIONS**
2. **FOR DISCUSSION**
3. **FOR INFORMATION**
4. **POLICIES POTENTIALLY GOING TO FIRST READING** (Intent and philosophy and edits)
None
5. **POLICIES POTENTIALLY GOING TO SECOND READING** (Line by line content and edits)
 - a. Bylaw 1: Board of Education (consideration will also be given to the provincial criteria guidelines for Trustee Codes of Conduct:
<http://www.bced.gov.bc.ca/bulletin/20230602/criteria-guidelines---may-25.pdf>)
 - b. 100: Sustainable Practices
 - c. 301: Living Wage
6. **POLICIES POTENTIALLY GOING TO THIRD AND FINAL READING**
(Final review including input on AP's)
 - a. 106: Financial Reporting and Operations Surplus
 - b. 900: Privacy Management and Accountability and AP's: Personal Information Management and Access; Privacy Breach Response; and, Privacy Impact Assessment
7. **FUTURE TOPICS**
8. **NEXT MEETING DATE**
Monday, September 18, 2023 via Zoom



PURPOSE

A bylaw to provide for procedures for the conduct of general school elections, other trustee elections, outline board role, trustee role and code of ethics.

I. ELECTION OF TRUSTEES:

Under the *School Act*, the Board of Education may, by bylaw, determine various procedures and requirements to be applied in the conduct of trustee elections.

In School District No. 69 (Qualicum), under the *School Act*, trustee elections in the following trustee electoral areas are the responsibility of the Board of Education of School District No. 69 (Qualicum):

<u>No. of Trustees to be elected.</u>	<u>Electoral Areas to be represented</u>
1	E of the Regional District of Nanaimo, District of Lantzville
1	F of the Regional District of Nanaimo
2	G of the Regional District of Nanaimo, the City of Parksville, the Town of Qualicum Beach and E of the Regional District of Powell River (Lasqueti Island)
1	H of the Regional District of Nanaimo

The Board of Education wishes to establish various procedures and requirements under the authority of the *School Act* for trustee elections.

The Board of Education, in an open meeting of the board, enacts as follows:

1. Definitions

The terms used shall have the meanings assigned by the *School Act* and the *Local Government Act*, except as the context indicates otherwise.

"Election" means a trustee election.

"Board" or "school board" means the Board of Education of School District No.69 (Qualicum).

2. Application

This bylaw applies to both general elections and by-elections and to those trustee elections carried out by other authorities, except as otherwise indicated.

3. Resolution of Tie Votes after Judicial Recount

In the event of a tie vote after a judicial recount, the tie vote will be resolved by conducting a lot in accordance with the *School Act* and the *Local Government Act*.



4. Mandatory Advance Voting Opportunities and Local Government Special Voting Opportunities

As required by the *Local Government Act* and the *School Act*, the mandatory advance voting opportunities are established as follows:

- i. on the tenth day before general voting day; and
- ii. for a trustee election that is the subject of an agreement or agreements with the local governments of the Regional District of Nanaimo, the City of Parksville, the Town of Qualicum Beach, the District of Lantzville or the Regional District of Powell River under which either the local government conducts all or part of the trustee election on behalf of the school board, or a local government election is conducted in conjunction with the trustee election: the date specified for the additional mandatory advance voting opportunity - as well as the date, location and voting hours of any special voting opportunities - in the general election bylaw of that local government, as it is amended from time to time, shall apply in the trustee electoral area or part of the trustee electoral area that is the subject of the agreement;
- iii. for a trustee election that is not the subject of an agreement referred to in (ii): the third day before general voting day.

5. Additional Advance Voting Opportunities

As authorized under the *Local Government Act* and the *School Act* the school board authorizes the chief election officer to establish additional advance voting opportunities for each election to be held in advance of general voting day and to designate the voting places, establish the date and the voting hours for these voting opportunities.

6. Additional General Voting Opportunities

As authorized by the *Local Government Act* and the *School Act*, the school board authorizes the chief election officer to establish additional voting opportunities for general voting day for each election and to designate the voting places and voting hours, within the limits set out in the *Local Government Act*, for such voting opportunities.

7. Special Voting Opportunities

As authorized under the *Local Government Act* and the *School Act*, the school board authorizes the chief election officer to establish special voting opportunities for each election and to designate the location, the date and the voting hours, within the limits set out in the *Local Government Act*, for such special voting opportunities.

8. Public Access to Election Documents

The Board authorizes posting of nomination documents of trustee candidates on the website of School District No. 69 (Qualicum) until 30 days after declaration of the election results.

9. Public Access to Election Documents Cont.



- i. The Board authorizes but does not require chief election officers to post nomination documents of trustee candidates for public access on any or all of websites of the City of Parksville, Town of Qualicum Beach, Regional District of Nanaimo and Regional District of Powell River, until such time as established by the bylaws of the relevant local government.
- ii. The Board authorizes posting of trustee candidates' campaign financing disclosure statements and declarations and supplementary statements and declarations on the website of School District No. 69 (Qualicum) until one year from general voting day.
- iii. The Board authorizes but does not require chief elections officers to post campaign financing disclosure statements for public access on any or all of websites of the City of Parksville, Town of Qualicum Beach, Regional District of Nanaimo and Regional District of Powell River, until such time as established by the bylaws of the relevant local government.

II. BOARD ROLE:

As the corporate body elected by the voters, the Board of Education is responsible for the development of goals and policies to guide the provision of educational services to students attending District schools and programs, in keeping with the requirements of government legislation and the values of the electorate.

SPECIFIC AREAS OF RESPONSIBILITY

1. Accountability to Governments

The Board shall:

- 1.1 Act in accordance with all statutory requirements of federal and provincial legislation to implement educational standards and policies.
- 1.2 Perform Board functions required by governing legislation and existing Board policy.

2. Accountability to and Engagement of Community

The Board shall:

- 2.1 Make decisions that address the needs and demands of the district.
- 2.2 Establish processes and provide opportunities for community input
- 2.3 Communicate the district strategic plan, and achievements of students and staff to the community, at least annually.
- 2.4 Develop procedures for and hear appeals as required by statute and/or board policy.
- 2.5 Provide for two-way communication between board and stakeholder groups.
- 2.6 Meet regularly with municipal governments and other educational/public service or business governing authorities to achieve educational ends.
- 2.7 Model a culture consistent with district values.



3. Planning

The Board shall:

- 3.1 Provide overall direction for the district by establishing a vision, values and strategic issues to be addressed.
- 3.2 Develop and approve the district's long term strategic plan.
- 3.3 Annually set district goals and key results, aligned with the district's strategic plan
- 3.4 Monitor progress toward the achievement of student outcomes and other desired results.
- 3.5 Annually evaluate the effectiveness of the district in achieving established goals and desired results.

4. Policy

The Board shall:

- 4.1 Identify the purpose to be achieved and the criteria for a new policy.
- 4.2 Make the final decision as to the approval of all policy statements.
- 4.3 Evaluate policy impact to determine if policy has created the desired change.
- 4.4 Determine policies and bylaws which outline how the board is to function.
- 4.5 Monitor policy changes and seek input on those changes.
- 4.6 Delegate authority to the superintendent and define commensurate responsibilities.

5. Board/Superintendent Relations

The Board shall:

- 5.1 Select the superintendent
- 5.2 Provide the superintendent with clear corporate direction.
- 5.3 Delegate in writing, administrative authority and identify responsibility subject to the provisions and restrictions in provincial legislation and regulations.
- 5.4 Evaluate the superintendent and review compensation in accordance with the superintendent's contract.
- 5.5 Respect the authority of the superintendent to carry out executive action and support the superintendent's actions which are exercised within the delegated discretionary powers of the position.

6. Political Advocacy

The Board shall:

- 6.1 Address external issues in a manner consistent with district values.
- 6.2 Make decisions regarding British Columbia School Trustee Association (BCSTA) and British Columbia Public Sector Employees' Association (BCPSEA) issues.
- 6.3 Advance district positions and priorities through relevant provincial organizations and associations.
- 6.4 Educate and inform the public



7. Board Development

The Board shall:

- 7.1 Annually evaluate the Board's effectiveness.
- 7.2 Annually develop a Board development plan aligned with District priorities.

8. Fiscal Accountability

The Board shall:

- 8.1 Approve process and timelines for budget deliberations.
- 8.2 In collaboration with the superintendent, identify assumptions and draft priorities for the creation of the annual budget.
- 8.3 Approve the annual budget which aligns with key goals and the strategic plan.
- 8.4 Annually approve the district's facilities planning document.
- 8.5 Annually appoint or reappoint the auditor and approve the terms of engagement.
- 8.6 Review annually the audit report and management letter.
- 8.7 Provide direction regarding the mandate for local employee negotiations.
- 8.8 Make decisions regarding ratification of memoranda of agreement with bargaining units.
- 8.9 Approve the acquisition and disposition of district land and buildings.
- ~~8.10 Approve tender selection for contracts over \$50,000 (fifty thousand dollars)~~
- 8.11 **8.10** Approve construction projects in excess of \$500,000 (five hundred thousand dollars) **major and minor capital projects prior to submission to the Ministry.**

9. Selected Responsibilities

- 9.1 Establish parameters for early retirement incentive plans.
- 9.2 Approve local school calendars, as requested in accordance with legislation.
- 9.3 Approve Board/Authority Authorized Courses
- 9.4 Hear appeals on the reconsideration of resource materials which are challenged.
- 9.5 Approve the naming of educational facilities and land.
- 9.6 Recognize students, staff and community members.
- 9.7 Approve school catchment areas.
- 9.8 Approve transportation service level changes.
- 9.9 Approve District partnerships.

III. ROLE OF THE TRUSTEE:

As members of the corporate board, trustees are accountable to the public for the collective decisions of the board and for the delivery and quality of educational services. A trustee must serve the community as an elected representative, but the trustee's primary task is to act as a member of a corporate board. A trustee acting individually has only the authority and status of any other citizen in the district.



Specific Responsibilities:

1. Support the decision of the Board and monitor progress to ensure decisions are implemented.
2. Strive to develop a positive and respectful learning and working culture both within the board and the district.
3. Become familiar with, and adhere to, the Trustee Code of Ethics.
4. Bring to the attention of the Board any issues that may significantly affect the District, and interpret the needs of the community to the board.
5. Refer queries, issues or problems raised by a parent or community member about a teacher or classroom, to the teacher or about a principal or a school, to the principal and, where appropriate, inform the Superintendent or designate. Also refer to School District 69 Board Policy 6005: *Resolution of Concerns*.
6. Act as a liaison to assigned schools according to purpose and parameters as outlined in Liaison Schools- Purpose and Parameters document.
7. Keep the Board and the Superintendent informed in a timely manner of matters coming to his/her attention that might affect the district.
8. Provide the Superintendent with counsel and advice, giving the benefit of the trustee's judgment, experience and familiarity with the community.
9. Come prepared to board meetings, participate in, and contribute to, the decisions of the board in order to provide the best solutions possible for the education of children within the district.
10. If a personal disagreement arises between a member of the team and another member, a one to one meeting between the two should be arranged to deal with and resolve the disagreement.
11. If there is any doubt about contacting employees of the district, the Superintendent or the Secretary Treasurer should be contacted first.
12. Strive to develop a positive and respectful learning and working culture both within the board and the district, based on collaboration and transparency.



IV. TRUSTEE CODE OF ETHICS:

1. It is vital that the Board of Education commits itself and its members to conduct which is appropriate and ethical. All personal interactions should be respectful and should acknowledge the worth of each person.
2. In compliance with the B.C. Human Rights Code, trustees will endeavor to ensure that all schools in School District 69 (Qualicum) provide the best quality education possible for all of our students regardless of their ability, sex, sexual orientation, gender identity or expression, creed, social standing or any physical or mental disability conditions.
3. Trustees must devote time, thought and study to the duties and responsibilities of being a trustee so as to be able to render effective and competent decisions.
4. Trustees must work together to communicate to the electorate the facts about our schools.
5. Trustees as individuals have no Board authority. All relationships must be conducted based on this fact. Media interviews must be handled by the Board Chair, Vice-chair or Superintendent unless expressly delegated to the individual trustee.
6. All in camera business is to be kept strictly confidential.
7. Trustees must respect the Superintendent's responsibility for the day-to-day administration of the district.
8. Trustees are expected to refer all complaints and criticisms to the proper process.
9. The board as a whole has to take responsibility to resolve potentially dysfunctional situations and strive to build dynamics that demonstrate:
 - 9.1 A commitment to collaborative decision-making
 - 9.2 A commitment to doing the homework and sharing responsibility
 - 9.3 A commitment to contributing to public meetings in a way that earns public confidence in the work of the Board
 - 9.3 A commitment to put the good of the school system before individual political agendas
 - 9.4 A commitment to focus at least as much on assessing the value of initiatives as in controlling costs



SCHOOL DISTRICT No. 69 (QUALICUM)

BOARD BYLAW 1

BOARD OF EDUCATION

(Page 8 of 8)

V. TITLE

This bylaw may be cited as "School District No.69 (Qualicum) Board of Education Bylaw No.1. "

Read a first time this 1st day of November 2019.

Read a second time this 28th day of January 2020.

Read a third and final time, passed and adopted this 25th day of February, 2020.

Signed copy on file

CHAIRPERSON OF THE BOARD

SECRETARY TREASURER



Context:

The Board of Education recognizes a world-wide climate emergency is occurring. Environmental sustainability is the responsibility of trustees, senior staff, principals/vice principals, teachers, students, support staff, parents and community.

Policy Statement:

The Board will take action to reduce operational and life-cycle costs, lessen the impact on our domestic energy infrastructure, and provide environmental stewardship through lower carbon emissions.

The Board will ensure that every effort is made to conserve energy and natural resources while exercising sound financial management.

The Board will provide a strong educational approach to understanding the climate emergency.

Guiding Principles:

- a. A strategic approach to energy management, including assessing baseline performance, setting goals and targets, creating an energy management plan, tracking performance and communicating results.
- b. The review and continuous improvement of the school district's energy management plan within the financial resources available.
- c. The development and delivery of educational programs, activities and initiatives that enable students to develop the skills, knowledge and attitudes that will help sustain the environment.
- d. Communicating environmental sustainability initiatives, and consulting with partner groups on the implementation of new initiatives.
- e. The encouragement **expectation** of students and staff to be cognizant of **actively reduce** their energy use and material consumption.
- f. The integration of environmentally sustainable considerations into the operations, educational and business decisions of the school district.
- g. The selection of equipment and systems in consideration of energy issues, product incentives and rebates from utility providers.

Definitions:

Sustainable practices are those business, educational, and individual practices that result in a smaller carbon footprint and enhanced presence in our curriculum aimed at creating a culture of conservation.

References:

- Administrative Procedure: Sustainable Practices
- Sustainable Schools Best Practices Guide, Ministry of Education

Dates of Adoption/Amendments:

Adopted: 92.02.25

Amended: 94.02.22: 16.08.31: **20.09.22**



Purpose

These Administrative Procedures will support Policy 100: Sustainable Practices in order to develop the collective responsibility to protect and conserve the environment.

Requirements

1. The Secretary-Treasurer (or designate) shall establish an energy management plan that includes, but is not limited to, the following components:
 - a. Integration of environmentally sustainable considerations into the school district's business decisions related to:
 - i. Lighting
 - ii. Heating, ventilation, air conditioning systems
 - iii. Renovation and new construction
 - iv. Recycling programs
 - b. Purchasing policies that encourage suppliers to meet or exceed the district's environmental management standards.
 - c. Mechanisms to regularly assess and continually improve the district's environmental sustainability performance.
 - d. Creating, managing and monitoring a carbon reduction plan in keeping with provincial programs and expectations of government.
2. The Director of Operations (or designate) will be responsible for managing all expenditures, and for formulating and implementing the energy management plan.
3. The Director of Operations (or designate) will be responsible for tracking and monitoring energy consumption, and for coordinating energy management and sustainability activities with principals/vice principals, teachers, support staff and students.
4. The school principal will facilitate energy management programs and procedures at the school. Efficient use of the various energy systems of each school will be the joint responsibility of the principal and the General-Manager Director of Operations. **This includes the closing of windows and doors during when the HVAC is required, turning off of lights, and the removal of extraneous applicances.**
5. Principals and vice-principals will be responsible for ensuring that climate action is a consideration for field trips in keeping with Board policy 502.
6. Teachers and support staff are encouraged to integrate environmental themes at every level and provide the opportunity for students to participate in energy management initiatives.



7. The District shall encourage the use of locally developed Environmental Studies courses and/or units in schools and learning activities that utilize a wide range of appropriate local environmental field trips.

References:

- Board Policy 100: Sustainable Practices
- Board Policy 502: Field Experiences (Trips)
- Sustainable Schools Best Practices Guide, Ministry of Education and Child Care

Dates of Adoption and Amendments:

Adopted: 16.08.31

Amended: 2020.09.22: **2022.10.25**



Context:

The Board strives to be a responsible and just employer in the Oceanside area. Paying a living wage on an hourly basis is a way to express these values. The Board understands that families may work less than part-time or have non-traditional family earnings and we share our responsibility for living wage provision with individuals, governments and community.

Policy Statement:

This Policy is to ~~ensure~~ **encourage** that all School District 69 (Qualicum) staff service providers and sub-contractors to our School District who work on School District premises for a specified period of time earn, at a minimum, an hourly *Living Wage* based on calculations which are congruent with the methodology developed by the *Living Wage For Families Campaign*.

Guiding Principles:

1. The Board of Education of School District 69 (Qualicum) believes that it is important to demonstrate social responsibility through actions that have a positive impact on our community, our staff and the people we serve.
2. The Board of Education believes that families should earn an hourly rate sufficient for them to pay for the basic necessities of life so that they can live with dignity and participate as active members of our communities.
3. As a responsible employer, the Board of Education recognizes that paying a *Living Wage* constitutes a critical investment in the well-being of our staff and the broader community.

Definitions:

1. Employees are all Union and Exempt Staff employed by the District in either a full-time, part-time, or casual, spare board, or replacement worker capacity.
2. *Living Wage* is the hourly rate of pay that enables wage-earners living in a family (2 parents and 2 children) household to:
 - a) Feed, clothe and provide shelter (based on rental rates) for their family
 - b) Promote healthy child development (child care expenses)
 - c) Participate in activities that are an ordinary element of life in the community
 - d) Avoid the chronic stress associated with living in poverty
 - e) Small savings to be used in emergencies.



Living Wage does not include:

- a) Debt or credit card repayment
 - b) Any significant savings (for example to provide a downpayment for a house or to send a student to university)
 - c) Recreation or entertainment costs beyond that needed for physical and emotional health.
 - d) Care of an ill, disabled or aged family member.
3. Premises are all District-owned premises, roadways, and grounds.
 4. Service Providers are companies and their employees that have a direct business relationship to the School District 69 (Qualicum). These employees are individuals that perform services to the District on District premises.
 5. Sub-contractors are companies and their employees that have been sub-contracted by our Service Providers. They do not have a direct business relationship with School District 69 (Qualicum).

References:

- <http://www.livingwageforfamilies.ca>
- *Administrative Procedures to Board Policy 301*

Dates of Adoption/Amendments:

Adopted: 15.11.24
Amended: **2020.04.28**



Purpose

These Administrative Procedures are written in support of Board Policy 301: Living Wage

Implementation, Compliance and Communication:

1. The living wage will be set annually by staff based on the methodology developed by the Living Wage for Families Campaign (www.livingwageforfamilies.ca)
2. This policy will encompass all district employees, service providers and sub-contractor employees with the following exclusions:
 - a. Students seeking work experience credits for educational purposes;
 - b. Volunteers; and,
 - c. Employees of organizations (for profit or not-for-profit) that lease space/property from the district.
3. The district, as a living wage employer, will ensure all staff are paid no less than the living wage as established in the year of ratifying of any of the district's collective agreements with its unions. The district will not open up any existing collective agreement during its existence to adjust hourly rates in the event those hourly rates dip below the living wage for that year. For example, if in year 2 of a 3-year agreement an employee's hourly rate falls below the living wage hourly rate for that present year, no alteration to the collective agreement will be considered.
4. The District has established the following criteria to determine a service provider's or sub-contractor's eligibility under the Living Wage Policy.
 - a. An employee of a service provider or of its sub-contractor must perform services physically on district premises.
 - b. Work must last longer than one four continuous hours per occasion.—**exceed 120 hours of labour per year, or 0.5% of the school district purchasing budget, as per Living Wage policy.**
5. The district requires all service providers and sub-contractors, whose services fall within the parameters established within this policy, to be compliant for the duration of their contract with the district.
6. The district will incorporate into all of its competitive bid documents (invitations to tender, requests for proposal, quotes, etc.) a sample declaration to be signed as part of the service provider's contract with the district.
- 7.—~~The district will enforce the policy by performing audits of its service providers and sub-contractors when notification of non-compliance is received by the district. Non-compliance may result in the cancellation of the contract at the discretion of the district.~~

Reference:

- Board Policy 301: Living Wage

Dates of Adoption and Amendments:

Adopted: 2015.11.24

Amended: 2020.04.28

FINANCIAL REPORTING AND OPERATING SURPLUSES

**Context:**

The Board of Education has a mandated obligation to care for and effectively use public funds to provide an educational program for all School District 69 (Qualicum) students. In order to ensure the financial integrity of the public accounts in its care, the Board requires the Secretary-Treasurer to develop and present to the Board quarterly financial reports at a Regular Public Board Meeting which outline the financial position of the School District. The Board also has a responsibility to effectively manage any accumulated surpluses. An accumulated operating surplus allows a School District to budget for expenditures in excess of revenues in a given year, and also serves to reduce financial risk that can result from financial forecasting uncertainty and unforeseen circumstances.

Policy Statement:

1. The Board expects management of current and future finances will be wise and prudent.
2. In all financial decision making, the interests of providing a quality educational program to students will be central.
3. Wherever possible, financial plans will consider environmental sustainability as an important short-term and long-term factor.
4. The Board expects (and is mandated) to prepare a balanced budget.
5. The Board will maintain an unrestricted operating surplus as a contingency reserve to be used to mitigate future budget shortfalls. If possible, the targeted amount of unrestricted operating surplus will be between 2% and 3% of the total operating budget **expenses** for that year.

Guiding Principles:

The Board believes that:

1. All school district business will conform with generally accepted best business management practices
2. To maintain an open and honest climate in School District 69, all financial documentation will be explainable and clearly understandable by trustees and the public.
3. Budget preparation will include planning, reviewing and decision-making phases. At each phase consultation with stakeholders and **the public, including First Nations and Métis Nation BC**, will be arranged and encouraged.
4. Budget planning will recognize needs of the students, the system, and new programs identified by all those involved in consultations and will align with existing policies, programs and initiatives [i.e. Framework for Enhancing Student Learning (FESL) and targeted funds for Indigenous Education].
5. Newly budgeted projects and programs will be fully reviewed and evaluated on an ongoing basis.
6. Financial reports will be presented quarterly at a public meeting of the Board.
7. An unrestricted operating surplus of between 2% and 3% of the preliminary budget should be built into budget planning.

Multi-Year Financial Plans

The Board annual operating budget is aligned with the three-year financial plan that the Board must develop, implement, and annually provide to the Ministry reflecting the implementation and maintenance of the Board's educational and operational objectives

FINANCIAL REPORTING AND OPERATING SURPLUSES



including enhanced student educational outcomes. The financial allocations included in the budget should support the strategic directions identified in the Board's Strategic Plan

Financial Reporting

The Board will also report the Board's progress on aligning funding and resources with their strategic plans and other operational needs of the school district, including enhancing student educational outcomes, by posting annual information on its website as part of its usual report out to stakeholders and the public.

The Board will use the existing Ministry financial reporting framework (including a Financial Statement Discussion and Analysis Report) to annually report on boards' progress towards meeting board objectives as outlined in their multi-year financial plans (for example, enhanced student educational outcomes and other operational needs of the board).

Definitions:

1. Accumulated operating surplus: The extent to which operating revenues from all previous years exceeds operating expenditures ~~from all previous years~~ **less Inter-Fund Transfers from current and prior years.**
2. Accumulated Operating Deficit: The extent to which operating expenditures from all previous years exceeds operating revenues ~~from all previous years.~~ **less Inter-Fund Transfers from current and prior years.**
3. **Accumulated Operating Deficit: The accumulated excess of Operating Expenses over Operating Revenues less Inter-Fund Transfers from current and prior years.**

References:

- The School Act, Part 6 – Boards of Education

Dates of Adoption/Amendments:

Adopted: 79.11.21

Amended: 84.06.06: 87.10.28: 89.02.22: 94.02.22: 00.11.28: 16.04.26: 2021.01.26:
2022.05.24



Financial Reporting

In order to ensure the financial integrity of the public accounts in its care, the Board of Education will be provided with quarterly financial reports showing the current financial status of the School District. These reports will include year-to-date summations of revenues and expenditures and will compare to the current budget and to prior year results.

Accumulated Operating Surpluses

The Accumulated Operating Surplus will be comprised of the following ~~two~~ components categories:

1. **Internally restricted operating surplus**

To support long-term financial planning the board can restrict operating surplus for use in future years within ministry-specified guidelines (see the [Ministry Companion Guide to the Accumulated Operating Surplus Policy](#)). To increase transparency, appropriations require a board motion. It is appropriate for some motions to be made in a closed board meeting (for example, related to land, legal or personnel matters), but the default should always be to a public meeting motion whenever possible.

Restrictions can be made for items that are identified by the board, have defined timelines, are directly related to a board's goals outlined in their strategic, operational and financial plans, or that meet the specified needs of the school district. The three streams of internally restricted operating surplus are:

- a. **Restricted due to the nature of constraints on the funds;**
- b. **Restricted for anticipated unusual expenses identified by the board; and**
- c. **Restricted for operations spanning multiple school years**

2. **Restricted for future capital cost sharing**

To support major capital projects that are identified in boards' 5-year Capital Plans, and approved by the Ministry for concept plan or business case development, the board may restrict operating surplus to satisfy capital project cost share expectations at the time the project is brought forward for funding approval. Capital cost share expectations can be found within the [Capital Planning Instructions](#).

3. **Local capital**

Local Capital includes the board's portion of any proceeds from the disposition of capital assets, transfers from operating funds and interest earned on Local Capital funds restricted for the purchase of tangible capital assets. Transfers from operating funds to Local Capital must be made only for specific initiatives that have a clear linkage to the board strategic goals, or that address capital assets investment, or that meet the specified needs of the school district.



4. **Unrestricted operating surplus (contingency)**

- a. ~~Appropriated Operating Surplus~~
- b. ~~Unrestricted Operating Surplus~~

1. In conjunction with the Board's review and approval of the annual financial statements, the Board will recognize a portion of the accumulated operating surplus (if one exists) for the purpose of forming a reserve for contingencies.
2. The unrestricted operating surplus will be sufficient to reduce, to an appropriate level, financial risk that results from financial forecasting risk and/or unforeseen circumstances.
3. Effective multi-year funding of projects and programs requires the allocation of prior year revenues to fund future expenditures and is achieved through budgetary appropriation of accumulated operating surplus.
4. ~~The balance of the accumulated operating surplus will be held as unrestricted operating surplus.~~
5. The unrestricted operating surplus is to be used only to fund additional cost pressures that result from circumstances beyond the School District's control or, with the Board's approval, in response to unforeseen circumstances.
6. Examples for use of the unrestricted operating surplus may include:
 - a. Elimination of any deficit arising at the end of the fiscal year
 - b. Incurring of new cost pressures in a fiscal year that were not known at the time of budget development
 - c. Settlement of legal action that is not covered by the School Protection Program
 - d. Initial one-time cost outlays for new educational programs
 - e. Coverage for disaster recovery expenditures
 - f. Extraordinary unknown utilities cost pressures
 - g. To appropriate to balance the next year's budget
7. When use of the unrestricted operating surplus reduces the balance below what is determined to be sufficient, the Board will adopt strategies for replenishing the unrestricted operating surplus within an appropriate timeframe.

5. **Reporting**

The board will use the existing Ministry financial reporting framework and the sample reporting template in the Companion Guide to annually provide the Ministry with an annual report on their budget allocation decisions, (including operating surplus and Local Capital), demonstrating that approved allocations support boards' strategic objectives.



Process

1. In conjunction with the Board's review and approval of the financial statements, the Secretary Treasurer will present for the Board's review and approval the internal restriction of accumulated operating surplus for:
 - a. Multi-year funding of projects and programs; and,
 - b. Capital project cost sharing
2. Prior to adoption of each annual budget and amended budget, the Secretary Treasurer will present for the Board's review and approval, allocation of budget for the purpose of unrestricted operating surplus, and when applicable, strategies for replenishing the unrestricted operating surplus, or opportunities for allocation of accumulated surplus to support annual program expenditures.

References:

- Board Policy 106: Financial Reporting and Operating Surpluses

Dates of Adoption/Amendments:

Adopted: 18.08.28

Amended: 2021.01.26: **2022.05.24**



**BOARD POLICY 900: INFORMATION MANAGEMENT AND ACCESS
PRIVACY MANAGEMENT AND ACCOUNTABILITY**

Context:

The Board of Education is committed to meeting its obligations to protect personal information from unauthorized access, use and disclosure in accordance with the *Freedom of Information and Protection of Privacy Act (FOIPPA)*, *The School Act* Sections 9 and 79 and Ministerial Order M14-91.

Policy Statement:

The Board will hold and provide access to student and all other files in full compliance with the FOIPPA, School Act and Ministerial Orders.

Guiding Principles:

The Board will provide clear written direction on the nature of and access to all files which will:

- a. **include being open and transparent about the purposes for which personal information may be collected and used by the School District;**
- b. control the manner in which the School District collects, retains, uses, accesses, discloses and disposes of employee and student personal information;
- c. allow any person a right of access to the records in the custody or under the control of the School District subject to limited and specific exceptions as set out in *FOIPPA*;
- d. allow individuals, subject to limited and specific exceptions as set out in *FOIPPA*, a right of access to personal information about themselves that is held by the School District;
- e. allow individuals a right to request corrections to personal information about themselves that is held by the School District; and
- f. provide for independent reviews of decisions made by the School District under *FOIPPA* and the resolution of complaints under the *FOIPPA*.

References:

- Administrative Procedure I – *Personal Information Management and Access* to Board Policy 900
- Administrative Procedure II – *Privacy Breach Response* to Board Policy 900
- Administrative Procedure III – *Privacy Impact Assessments* to Board Policy 900
- Board Policy 501: *Acceptable Use of Technology* and its attendant Administrative Procedure
- School District 69 Personal Information Directory
- SD69 File Management Handbook
- *Freedom of Information and Protection of Privacy Act*
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00
- The *School Act* (Section 9)
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_02#section9
and (section 79)
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_06#section79
- Ministerial Order M14/91
https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m14_91.pdf

Adopted/Amended:

Adopted: 1980.01.23



**BOARD POLICY 900: ~~INFORMATION MANAGEMENT AND ACCESS~~
PRIVACY MANAGEMENT AND ACCOUNTABILITY**

Amended: 19.85.07.03: 1987.11.25: 1989.01.25: 1991.02.12: 1996.06.18: 2001.02.27:
Interim Revision September 2010: 2020.01.28: **2022.09.13**



ADMINISTRATIVE PROCEDURES I TO BOARD POLICY 900:
INFORMATION MANAGEMENT AND ACCESS

PRIVACY MANAGEMENT AND ACCOUNTABILITY

PERSONAL INFORMATION MANAGEMENT AND ACCESS

PURPOSE

The purpose of this administrative procedure is to set out how the District will handle employee and student personal information. This administrative procedure should be read in conjunction with Board Policy 900: Information Management and Access. See Appendix I for definitions.

ROLES AND RESPONSIBILITIES

1. The Superintendent of Schools/CEO is recognized as the Head of the Public Body (or any person to whom the Head has delegated their powers by written instrument).
2. The Secretary Treasurer is recognized as the Privacy Officer for the District and is responsible for:
 - a. conducting a privacy audit and self-assessment;
 - b. developing a privacy policy;
 - c. implementing and maintaining a privacy policy
 - d. managing privacy training;
 - e. responding to requests for access to and correction of personal information;
 - f. working with the Information and Privacy Commissioner in the event of an investigation.
3. The Executive Assistant to the Secretary-Treasurer will provide appropriate supports to the Privacy Officer.
4. Employees must:
 - a. complete mandatory privacy and information management training;
 - b. not alter, copy, interfere with or destroy personal information, except as required;
 - c. not disseminate personal information to anyone not covered by a confidentiality agreement;
 - d. practice safeguarding measures to ensure personal information held by the School District is protected from unauthorized access, use and disclosure; ~~and~~,
 - e. ensure that disclosures of information are made only to those entitled to that information, and.
 - f. **Report privacy breaches to the School District**

COLLECTING PERSONAL INFORMATION

5. The School District has the legal authority to collect personal information that relates directly to and is necessary for its operating programs or activities or as otherwise authorized by statute. Personal information will be collected directly from the individual to whom it pertains, unless another method of collection is authorized by the individual or the statute.



**ADMINISTRATIVE PROCEDURES I TO BOARD POLICY 900:
INFORMATION MANAGEMENT AND ACCESS**

PRIVACY MANAGEMENT AND ACCOUNTABILITY

6. When the School District collects personal information about students or families, parents/guardians should be informed of the purpose for which the information is being collected. The parents/guardians of a student must authorize the disclosure of personal information for purposes ancillary to educational programs, such as:
 - newsletter publications;
 - website postings;
 - video conferencing;
 - social media applications;
 - honour roll lists;
 - team rosters;
 - yearbooks.
7. Upon their child's initial enrollment, parents / guardians will complete and submit the form entitled Student FOIPPA / Personal Information Consent.
8. Where a parent or guardian provides consent, the School District will allow the school to publish student personal information for purposes such as:
 - recognition of achievement;
 - promotion of events;
 - commemoration of school events.

This authorization is deemed in effect until the student changes or transitions to another school.

9. Parents / guardians will have the ability to opt out of providing information that is not directly related to a student's educational program or necessary for the School District's operational activities.

USE OF PERSONAL INFORMATION

10. Personal information will be used for the purpose for which it was collected or for a use consistent with that purpose. Employees should seek clarification from the District Privacy Officer if there is uncertainty as to the confidentiality of the information or they need to access information for a purpose other than why it was collected.

RETENTION AND DISPOSAL OF PERSONAL INFORMATION

11. Personal information must be retained for specific periods of time. See Appendix II for the records retention and disposal schedule.
12. Information management must be dealt with in a responsible, efficient, ethical and legal manner. The following safeguards, though not an exhaustive list, will assist in protecting the privacy of employee and student personal information:



**ADMINISTRATIVE PROCEDURES I TO BOARD POLICY 900:
INFORMATION MANAGEMENT AND ACCESS**

PRIVACY MANAGEMENT AND ACCOUNTABILITY

- a. security measures, such as encryption or passwords, must be in place for personal information that is electronically stored, printed, or transferred;
 - b. all mobile devices, including personal devices, that access or store District data must be secured by a password login and have the highest available encryption options;
 - c. passwords must not be shared nor should anyone login to a system using an username and password that has not been specifically assigned to them;
 - d. locate screen in such a way that it can't be read by visitors or people passing by;
 - e. lock the computer screen when away from your desk;
 - f. paper files should be held in locked storage;
 - g. personal information should be removed from work areas when not in use; and,
 - h. paper files, including notes, reports, letters and emails, containing personal information should be protectively marked as private and confidential.
13. Any personal information that is held electronically and is no longer required for administrative, financial or legal purposes must be deleted in their entirety and data storage devices must be fully erased prior to disposal.
14. Paper files containing employee and student personal information that are due for disposal must be securely shredded.

DISCLOSING PERSONAL INFORMATION

16. Personal information may be disclosed to an external or third party if the individual who is the subject of the information has provided written consent. In the case of a student under the age of thirteen, such consent may be provided by the student's parent or guardian.
17. Disclosure of personal information is permitted if the information is immediately necessary for the protection of the health and safety of an employee.
18. Consent is not required from a student or parent when information is being disclosed for worker safety. If a plan is developed to protect the health and safety of a worker, which also affects the health and safety of a student, the parent will be informed, as per the requirements of the School Act. However, parental approval is not required to develop and implement plans to keep workers safe.
19. Managers and Principals are required to investigate incidents that caused or could have caused injury to an employee, in conjunction with the members of the school or work site's Joint Health and Safety Committee.
20. Incident report forms contain employee personal information and therefore cannot be disclosed to employees outside of the committee, except for the purpose of reporting incident to WorkSafe BC.



SCHOOL DISTRICT No. 69 (QUALICUM)

ADMINISTRATIVE PROCEDURES I TO BOARD POLICY 900: INFORMATION MANAGEMENT AND ACCESS

PRIVACY MANAGEMENT AND ACCOUNTABILITY

Page 4 of 15

21. If student information is used to complete an incident investigation or report, personal identifiers must be removed so that the student is not able to be identified.

ACCESS TO PERSONAL INFORMATION

22. Access to any personal information is based on employment duties requiring such access. Unauthorised access to information about colleagues, friends, or family is not permitted.
23. The School District governs the right of access by an individual to their own personal information and by the public to any information or records in its custody or control.
24. Other school districts, government ministries or law enforcement agencies may have access to personal information where obtaining this information is necessary for the provision of their services.
25. Requests for access to information, including access to personal information, must be made in writing and must provide sufficient detail to enable the School District, with reasonable effort, to identify the records sought. A record of all such transactions must be kept on file.

STUDENT PERSONAL INFORMATION

26. Access to student records will be in accordance with Board Policy 7144: Student Records 900: Personal Information Management and Access and its attendant Administrative Procedure.
27. Routine requests will be handled at the point-of-contact. Formal written requests will be handled by the District Privacy Officer through the office of the Secretary Treasurer.

EMPLOYEE PERSONAL INFORMATION

28. Access to personal information may be gained during normal business hours, upon appointment and is available to:
 - a. the employee, in the presence of a supervisory officer, or the appropriate personnel officer;
 - b. other parties (e.g. legal counsel of the employee) with the specific written consent of the employee;
 - c. appropriate Board employees and/or the Board's legal counsel, subject to the approval of the Superintendent or designate, or the appropriate personnel officer.
 - d. the individual, in the presence of the appropriate manager or a designate; and/or,
 - e. other parties (e.g. legal counsel for the individual) with the specific written consent of the individual.

FEES



ADMINISTRATIVE PROCEDURES I TO BOARD POLICY 900:
INFORMATION MANAGEMENT AND ACCESS

PRIVACY MANAGEMENT AND ACCOUNTABILITY

29. When fees are to be levied under the *Freedom of Information and Protection of Privacy Act (FOIPPA)* the rates adopted by the Government of British Columbia, as specified in Schedule 1 (*attached*) of the Regulation 155/2012 under the *FOIPPA*, shall be confirmed as the rates used by the School District. Fees shall not be charged to individuals who are accessing their own personal information. See Appendix III for the fee schedule.

ERRORS OR OMISSIONS

30. An applicant who believes there is an error or omission in their personal information may request correction of the information in writing to the department responsible for the information. The Manager responsible for collecting and retaining the particular type of record will be responsible for the correction or annotation of the information, in consultation with the District Privacy Officer.
31. Notification of the correction or annotation must be given to any other public body or third party to whom that information has been disclosed during the one year period before the correction was requested.
32. Any correction, annotation or notification must be documented.

INVESTIGATION OF COMPLAINTS

33. Anyone suspecting or aware of the unauthorized collection, use, access, or disclosure of student or employee information or other protocol set out in this administrative procedure must notify the District Privacy Officer.
34. All employees, volunteers and third parties are expected to adhere to the confidentiality requirements of the School District. Those found to be in violation of this procedure may be subject to disciplinary action.

References:

- Board Policy 900: *Personal Information Management and Access*
- Board Policy 501: *Acceptable Use of Technology* and its attendant Administrative Procedure
- School District 69 Personal Information Directory
- SD69 File Management Handbook
- *Freedom of Information and Protection of Privacy Act*
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00
- The *School Act* (Section 9)
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_02#section9
- And (section 79)
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_06#section79



SCHOOL DISTRICT No. 69 (QUALICUM)

ADMINISTRATIVE PROCEDURES I TO BOARD POLICY 900: INFORMATION MANAGEMENT AND ACCESS

PRIVACY MANAGEMENT AND ACCOUNTABILITY

Page 6 of 15

- Ministerial Order M14/91
https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m14_91.pdf

Adopted/Amended:

Adopted: 1980.01.23

Amended: 19.85.07.03: 1987.11.25: 1989.01.25: 1991.02.12: 1996.06.18: 2001.02.27:
Interim Revision September 2010: 2020.01.28: **2022.09.13**

Appendix 1 – Definitions

Personal information	Any information that is about an identifiable individual. Personal information may include data such as unique identifiers (social insurance number, school records, contact numbers, gender, medical history, education, employment, psychiatric history, behavioural assessments, personnel evaluations, digital images, audio and video recordings, racial or ethnic origins, sexual orientation or religious beliefs.
Contact information	This enables an employee to be contacted at work and includes the name, position, business contact number, business address and business email.
Employee personal information	This is any recorded information about an identifiable employee (see personal information above) other than contact information.
Student personal information	This includes personal information (defined above) plus any information that identifies a student include a student's name, address, contact number, personal education number (PEN), assessments, results, and educational records.
Record	A record is defined as all recorded information in the custody or control of the School District regardless of physical format, which is collected, created, deposited or held by or in the School District. Records include books, documents, maps, drawings, photographs, letters, paper or any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means.

Appendix II – Records Retention and Disposal Schedule

The principal of the school or the supervisor of the department responsible for the records is authorized to destroy the records in accordance with the following schedule. Records may be maintained beyond the scheduled time if the principal or supervisor believes that they have a further use or historical or archival value.

The following retention schedule outlines the minimum amount of time that School District 69 records must be retained:

Board Records

Board policy	Permanent
Agendas of regular, in-camera and special board meetings	Permanent
List of electors	2 years after the year of creation
Minutes	Permanent
Notice of meetings	1 year
Oaths and declaration of trustees	Selected Retention
School trustees list	While current
Debenture and bylaw register	Permanent
Debenture and coupons redeemed	6 years after year redeemed
Annual Report as required by the School Act	Permanent
District publications and newsletters	Selected Retention

Information and Privacy

Freedom of Information requests	2 years after the calendar year of creation
Requests to review Freedom of Information decisions	5 years after investigation, review, inquiry or adjudication is complete and order has been issued
Freedom of Information requests to correct personal information	2 years after the personal information has been updated, annotated, or request has been transferred to another public body

Financial Records

Annual budget and summary supporting documents	Permanent
Auditor's reports	Permanent
Cancelled cheques	6 years after year of creation
Cheque duplicates, invoices, requisitions	6 years after year of creation

Purchase orders	2 years after year of creation
Employee travel claims	6 years after year of creation
Ministry of Education financial information reports	Permanent
General ledger	Permanent
Invoices billed	6 years after year of creation
Subsidiary ledgers and journals	6 years after year of creation
Receipts issued	6 years after year issued
Bank statements, debit and credit notes	6 years after year of creation
Deposit books	6 years after year of creation
Loans, authorization	6 years or term of loan, if longer
Loans, cancelled notes	6 years after year of creation
Stop payment orders	1 year after year of creation

Facilities Records

Rental of facilities	1 year after year of rental
Appraisal and inventory records	6 years after year of asset disposal
Authorization for expenditure of capital funds	6 years after year capital plan completed
Building plans and specifications (with related change, guarantees, bonds liens and valuable correspondence)	6 years after year of asset disposal
Land titles, deeds and plans	Permanent
Leases	6 years after expiration of term

General Records

General correspondence 2 years after year of creation

Human Resource Records

Applications 1 year after position is filled

Job Competitions Selected Retention

Collective Agreements with unions Permanent

Contracts with individual employees 20 years after the year employment ceases

Teacher-on-Call files 5 years after the year employee leaves district

Individual grievance files Permanent

Letters of discipline 20 years after the year employment ceases

Personnel file 20 years after the year employment ceases

Seniority lists Permanent

Unsolicited resumes 6 months

Violence incident reports 6 years after year of creation

Employee medical file 20 years after the year employment ceases

Information Systems

User ID's When user is removed from the system

Insurance Records

Incident Reports 2 years or until finalized

Claims 6 years after claim settled for adults; 2 years after age of majority is reached for individuals under 19 years

Insurance policies While current

Payroll Records

Employee payroll files	20 years after the year employee leaves district
Employee payroll register	20 years after the year employee leaves district
Employee attendance records	6 years after the year employment ceases

Purchasing Records

Quotations and relative correspondence	6 years after year of creation
Purchasing contracts	6 years after year of creation
Requisitions and purchase orders	6 years after year of creation

Student Records

Student Information Data	Permanent
Permanent Record Cards	55 years after graduation or withdrawal
- <u>Form 1704 (MyEdBC)</u>	
- <u>A minimum of the two most recent years of student Progress Reports</u>	
<u>OR</u>	
<u>An official copy of the Transcript of Grades</u>	
Attendance reports and registers	Permanent
Out-of-boundary attendance requests	2 years after decision is made
Provincial scholarships and district awards	Permanent
Transcript of Marks	Permanent
Teachers' student files	While current
Other student records	Useful life of record

Transportation Data

Student bus registration forms	1 year after year of creation
Transportation assistance forms	1 year after year of creation
School bus behaviour report	1 year after year of creation
School bus video tapes	1 year after year of creation as needed
Vehicle maintenance forms	life of bus
Pre-trip forms	3 months
Driver time logs	6 months

Health and Safety Records

References refer to the applicable part from the WCB Occupational Health and Safety Regulation and/or the Workers Compensation Act.

Topic	Type of Records	Reference	Length of time	Springhill	Board Office	Worksite /School
Asbestos	<ul style="list-style-type: none"> • inventory of asbestos containing materials • risk assessments • inspections • air monitoring 	6.32(1)	10 years			x
	<ul style="list-style-type: none"> • corrective actions to control the release of asbestos fibres • written work procedures • written notification to WorkSafeBC of abatement works • training and instruction of workers 	6.32	3 years 6 years	x	x	

Topic	Type of Records	Reference	Length of time	Springhill	Board Office	Worksite /School
Automotive Lifts and Hoists	<ul style="list-style-type: none"> inspection reports maintenance and testing 	12.78	while equipment in use			x
Biohazardous Material	<ul style="list-style-type: none"> worker exposures investigation reports 	5.59(3)	length of employment plus 10 years		x	
	<ul style="list-style-type: none"> worker education and training 	6.41	6 years		x	
Competency of equipment operators		16.4	length of employment		x	
Cranes and Hoists	<ul style="list-style-type: none"> inspection reports maintenance 	14.14	while equipment in use			x
Elevated Work Platforms	<ul style="list-style-type: none"> inspection Reports maintenance repairs modifications 	13.163	while equipment in use	x		
Fire Fighting Equipment	<ul style="list-style-type: none"> tests inspections 	31.9	while in use			x
First Aid	<ul style="list-style-type: none"> injury or illness report 	3.19	3 years			x
Hazardous Substances	<ul style="list-style-type: none"> inventory 	5.98(1)	while in use			x
	<ul style="list-style-type: none"> exposure reports investigation reports 	5.59(3)	length of employment plus 10 years		x	

Topic	Type of Records	Reference	Length of time	Springhill	Board Office	Worksite /School
Incident Investigation Reports		WC Act	6 years			x
Joint Health and Safety Committee Meetings	<ul style="list-style-type: none"> meeting minutes 	WC Act	2 years			x
Lead	<ul style="list-style-type: none"> risk assessments 	6.68	while current			X
	<ul style="list-style-type: none"> worker exposure report health monitoring worker training 	6.68	length of employment plus 10 years		x	
Noise	<ul style="list-style-type: none"> hearing test for each worker working in a noise environment 	7.8	length of employment plus 10 years		x	
	<ul style="list-style-type: none"> noise exposure measurement results 	7.8 (2)	while equipment in use			x
Radiation	<ul style="list-style-type: none"> surveys 	7.43	10 years			x
Workplace Inspections		WC Act	1 year			x

APPENDIX III
Schedule 1
Schedule of Maximum Fees
As per BC Reg. 155/2012 (O.C. 591/2012)

Item	Column 1	Column 2
	Description of Services	Management Fees
1	For applicants other than commercial applicants:	
	(a) for locating and retrieving a record	\$7.50 per 1/4 hour after the first 3 hours
	(b) for producing a record manually	\$7.50 per 1/4 hour
	(c) for producing a record from a machine readable record from a server or computer	\$7.50 per 1/4 hour for developing a computer program to produce the record
	(d) for preparing a record for disclosure and handling a record	\$7.50 per 1/4 hour
	(e) for shipping copies	actual costs of shipping method chosen by applicant
	(f) for copying records	
	(i) floppy disks	\$2 per disk
	(ii) CDs and DVDs, recordable or rewritable	\$4 per disk
	(iii) computer tapes	\$40 per tape, up to 2 400 feet
	(iv) microfiche	\$3 per fiche
	(v) microfilm duplication	\$25 per roll for 16 mm microfilm, \$40 per roll for 35 mm microfilm
	(vi) microfiche or microfilm to paper duplication	\$0.50 per page (8.5" x 11")
	(vii) photographs, colour or black and white	\$5 to produce a negative
		\$12 each for 16" x 20" photograph
		\$9 each for 11" x 14" photograph
		\$4 each for 8" x 10" photograph
		\$3 each for 5" x 7" photograph
	(viii) photographic print of textual, graphic or cartographic record, black and white	\$12.50 each (8" x 10")
	(ix) dot matrix, ink jet, laser print or photocopy, black and white	\$0.25 per page (8.5" x 11", 8.5" x 14" or 11" x 17")
	(x) dot matrix, ink jet, laser print or photocopy, colour	\$1.65 per page (8.5" x 11", 8.5" x 14" or 11" x 17")
	(xi) scanned electronic copy of a paper record	\$0.10 per page
	(xii) photomechanical reproduction of 105 mm cartographic record/plan	\$3 each
	(xiii) slide duplication	\$0.95 each
	(xiv) audio cassette tape (90 minutes or fewer) duplication	\$5 per cassette plus \$7 per 1/4 hour of recording
	(xv) video cassette recorder (VHS) tape (120 minutes or fewer) duplication	\$5 per cassette plus \$7 per 1/4 hour of recording
2	For commercial applicants for each service listed in Item 1	the actual cost to the public body of providing that service



**ADMINISTRATIVE PROCEDURES II TO BOARD POLICY 900:
INFORMATION MANAGEMENT AND ACCESS**

PRIVACY MANAGEMENT AND ACCOUNTABILITY

PRIVACY BREACH RESPONSE

PURPOSE

The Board of Education of School District No. 69 ("School District") 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 this Procedure is to set out the School District's process for responding to significant privacy breaches and to comply with its notice and other obligations under the Freedom of Information and Protection of Privacy Act (FIPPA).

Responsibilities of Staff

- a. All Staff must without delay report all actual, suspected or expected Privacy Breach incidents of which they become aware in accordance with this Procedure. All Staff have a legal responsibility under FIPPA to report Privacy Breaches to the Head.
- b. Privacy Breach reports may also be made to the Privacy Officer, who has delegated responsibility for receiving and responding to such reports.
- c. If there is any question about whether an incident constitutes a Privacy Breach or whether the incident has occurred, Staff should consult with the Privacy Officer.
- d. All Personnel must provide their full cooperation in any investigation or response to a Privacy Breach incident and comply with this Procedure for responding to Privacy Breach incidents.
- e. Any member of Staff who knowingly refuses or neglects to report a Privacy Breach in accordance with this Procedure may be subject to discipline, up to and including dismissal.

Privacy Breach Response

Step One – Report and Contain

- a. Upon discovering or learning of a Privacy Breach, all Staff shall:
 - i. Immediately report the Privacy Breach to the Head or to the Privacy Officer.
 - ii. Take any immediately available actions to stop or contain the Privacy Breach, such as by:
 - isolating or suspending the activity that led to the Privacy Breach; and
 - taking steps to recover Personal Information, Records or affected equipment.
 - iii. preserve any information or evidence related to the Privacy Breach in order to support the School District's incident response.
- b. Upon being notified of a Privacy Breach the Head or the Privacy Officer in consultation with the Head, shall implement all available measures to stop or contain the Privacy Breach. Containing the Privacy Breach shall be the first priority of the Privacy Breach response, and all Staff are expected to provide their full cooperation with such initiatives.



**ADMINISTRATIVE PROCEDURES II TO BOARD POLICY 900:
INFORMATION MANAGEMENT AND ACCESS**

PRIVACY MANAGEMENT AND ACCOUNTABILITY

Step Two – Assessment and Containment

- a. The Privacy Officer shall take steps, in consultation with the Head, to contain the Privacy Breach by making the following assessments:
 - ii. the cause of the Privacy Breach;
 - iii. if additional steps are required to contain the Privacy Breach, and, if so, to implement such steps as necessary;
 - iv. identify the type and sensitivity of the Personal Information involved in the Privacy Breach, and any steps that have been taken or can be taken to minimize the harm arising from the Privacy Breach;
 - v. identify the individuals affected by the Privacy Breach, or whose Personal Information may have been involved in the Privacy Breach;
 - vi. determine or estimate the number of affected individuals and compile a list of such individuals, if possible; and,
 - vii. make preliminary assessments of the types of harm that may flow from the Privacy Breach.

- b. The Head, in consultation with the Privacy Officer, shall be responsible to, without delay, assess whether the Privacy Breach 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:
 - i. bodily harm;
 - ii. humiliation;
 - iii. damage to reputation or relationships;
 - iv. loss of employment, business or professional opportunities;
 - v. financial loss;
 - vi. negative impact on credit record,
 - vii. damage to, or loss of, property,
 - viii. the sensitivity of the Personal Information involved in the Privacy Breach; and
 - ix. the risk of identity theft

Step Three – Notification

- a. 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:
 - i. report the Privacy Breach to the Office of the Information and Privacy Commissioner; and
 - ii. 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.

- b. 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



ADMINISTRATIVE PROCEDURES II TO BOARD POLICY 900:
~~INFORMATION MANAGEMENT AND ACCESS~~

PRIVACY MANAGEMENT AND ACCOUNTABILITY

or if a failure to notify would be inconsistent with the School District's obligations or undermine public confidence in the School District.

- c. 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.

Step 4 - Prevention

The Head, or the Privacy Officer in consultation with the Head, shall complete an investigation into the causes of each Breach Incident reported under this Procedure, and shall implement measures to prevent recurrences of similar incidents.

References:

- Board Policy 900: *Privacy Management and Accountability*
- Administrative Procedure I – *Personal Information Management and Access to Board Policy 900*
- Administrative Procedure III – *Privacy Impact Assessments to Board Policy 900*
- Board Policy 501: *Acceptable Use of Technology* and its attendant Administrative Procedure
- School District 69 Personal Information Directory
- SD69 File Management Handbook
- *Freedom of Information and Protection of Privacy Act*
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00
- The *School Act* (Section 9)
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_02#section9
- And (section 79)
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_06#section79
- Ministerial Order M14/91
https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m14_91.pdf

Adopted/Amended:

Adopted: 1980.01.23

Amended: 19.85.07.03: 1987.11.25: 1989.01.25: 1991.02.12: 1996.06.18: 2001.02.27:
Interim Revision September 2010: 2020.01.28: **2022.09.13**



**ADMINISTRATIVE PROCEDURES III TO BOARD POLICY 900:
INFORMATION MANAGEMENT AND ACCESS
PRIVACY MANAGEMENT AND ACCOUNTABILITY**

PRIVACY IMPACT ASSESSMENTS

PURPOSE

The Board of Education of School District No. 69 ("School 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 School District conduct a Privacy Impact Assessment ("PIA") to ensure that all collection, use, disclosure, protection and processing of Personal Information by the School 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 this Procedure is to set out the School District's process for conducting PIAs in accordance with the provisions of FIPPA.

RESPONSIBILITIES OF ALL EMPLOYEES

Any Employees 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 School District must report that Initiative to the Privacy Officer at an early stage in its development.

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.

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.

THE ROLE OF THE RESPONSIBLE EMPLOYEE (*responsible for overseeing the initiative, i.e. District Principal, IT*)

Responsible Employees are responsible for:

- a. 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;
- b. supporting all required work necessary for the completion and approval of the PIA;
- c. being familiar with and ensuring that the Initiative is carried out in compliance with the PIA; and
- d. requesting that the Privacy Officer make amendments to the PIA when needed and when significant changes to the initiative are made.



**ADMINISTRATIVE PROCEDURES III TO BOARD POLICY 900:
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INITIATIVES INVOLVING THE STORAGE OF PERSONAL INFORMATION OUTSIDE OF CANADA

- a. 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 (or enhanced) Review.
- b. 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.
- c. 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.
- d. The Head is responsible for reviewing and, if appropriate, approving all Supplemental Reviews and in doing so must consider risk factors including:
 - i. the likelihood that the Initiative will give rise to an unauthorized, collection, use, disclosure or storage of Personal Information;
 - ii. the impact to an individual of an unauthorized collection, use, disclosure or storage of Personal Information;
 - iii. whether the Personal Information is stored by a service provider;
 - iv. where the Personal Information is stored;
 - v. whether the Supplemental Review sets out mitigation strategies proportionate to the level of risk posted by the Initiative.
- e. Approval of a Supplemental Review by the Head shall be documented in writing.

References:

- Board Policy 900: *Privacy Management and Accountability*
- Administrative Procedure I – *Personal Information Management and Access to Board Policy 900*
- Administrative Procedure II – *Privacy Breach Response to Board Policy 900*
- Board Policy 501: *Acceptable Use of Technology* and its attendant Administrative Procedure
- School District 69 Personal Information Directory
- SD69 File Management Handbook
- *Freedom of Information and Protection of Privacy Act*
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00
- The *School Act* (Section 9)
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_02#section9
- And (section 79)
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96412_06#section79
- Ministerial Order M14/91
https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m14_91.pdf