

**North Vancouver Parent Advisory Council  
(NVPAC)**

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**NVPAC Communications Guidelines for PACs  
With Respect to:**

- **Compliance with Privacy of Information Acts**
- **Best Practices for Electronic Communications**
- **Compliance with Anti-Spam Legislation (CASL)**
- **Contact Lists**

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# 1. Summary of Key Points

## 1. Compliance with Privacy of Information Acts and Anti-Spam Legislation

- The officers of a PAC are legally responsible to ensure PAC compliance with PIPA and CASL regulations.
- Five Key Concerns for PACs:
  - The safe storage of personal information.
  - The collection and dissemination of personal information to volunteers and parents.
  - Compliance with anti-spam legislation (CASL).
  - The disclosure of contact information to third parties such as hot lunch programs.
  - The use of photographs of people at school events in newsletters or on the Internet.

## 2. Best Practices for Electronic Communications

- Collection of personal information including email addresses must comply with the Personal Information Protection Act (PIPA).
- All emails must be clearly marked as a PAC communication and for school or community use only – no commercial, political or personal messages are appropriate.
- All emails must be circulated with addresses blind copied: **BCC**.
- All emails must include an “opt-out” (unsubscribe option) to allow parents to request removal from a PAC email list at any time.

## 3. Contact Lists

- PACs must collect personal information for contact lists independently of the school.
- Collect information on a standard form which has been approved for use District-wide.
- The collection of personal information for contact lists necessitates “informed consent” by the individuals from whom the information is collected.
- All paper and electronic permission forms and lists should be destroyed at the end of the school year.
- A school-wide directory should be compiled only after consultation with the school principal.
- School wide directories should never be sold as this may compromise the use of personal information.

## 2. PAC Compliance with Privacy of Information Acts

PACs regularly collect and use information on students and their families for communication. Much of this information is sensitive and must be handled in a way that ensures compliance with the [Personal Information Protection Act \(PIPA\)](#). This provincial legislation covers how non-governmental organizations (including PACs and corporations) must handle confidential personal information.

The collection and storage of any records containing personal information such as PAC contact lists, personal phone numbers, addresses or personal emails, volunteer or committee lists, donor lists and awards or prizes, must adhere to PIPA's privacy regulations. If PACs fail to comply with the Act then the PAC is legally liable and can be sued for actual (not punitive) damages or receive a significant fine. Responsibility for legal compliance lies with the PAC and not with the individual volunteers who collected, used, or shared the information.

### **Best Practices to ensure compliance with PIPA:**

- Obtain Consent: a PAC can collect personal information and disseminate it provided the parents provide informed consent. A record of the consent should be kept.
- Be clear when collecting information: clearly explain what will be done with it, where it will be stored, who will use it, and who will have access to it. Do this in writing and on a standard form approved for use District-wide. (See Appendix A and B.)
- Collect only what you need: the less information you have the less exposure to risk.
- Limit the use of the information to only the purpose described, and obtain consent from individuals each time the information is collected or a new use is proposed.
- Collect consent prior to publication: publication includes posting to social media websites.
- Translate forms for non-English speakers.
- Identify who is accountable for the collection of personal information. Only provide data to those PAC volunteers who need it for the purpose for which it was collected.
- Safeguard personal information from unauthorized access.
- Delete information that is no longer needed for the consented purpose and maintain lists for the current year only.
- Investigate and openly resolve complaints and concerns.

### **Record Security:**

The act requires that *“An organization must protect personal information in its custody or under its control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.”*

- PAC information should be stored on password-protected computers, servers or flash drives.
- Passwords should be given only to the few people who need it for the intended use.
- Laptops and portable drives should be kept in secure locations such as homes, offices or desks.
- During transportation it is reasonable to treat laptops, lists or flash drives like a wallet or purse.

### **Destruction of Records:**

The act requires that data be destroyed as soon as it is no longer needed or required for legal purposes. Typically PAC contact data, including PAC copies and backups of previous lists, should be destroyed within a year of collection. It is good practice to state how long the data will be kept at the time of collection on the actual form used.

The means of records destruction must be reasonable and secure. For electronic data when a file is deleted it is not actually destroyed. To ensure their destruction, files should be securely erased and overwritten with other data using a secure file deletion utility.

## **The School District and FIPPA:**

School districts are public bodies subject to a different law, [The Freedom of Information and Protection of Privacy Act \(FIPPA\)](#). FIPPA governs the collection, use and potential disclosure of personal information by governments and their agencies.

The School District has a different set of rules it must follow regarding the use of personal information and PACs should understand and respect the needs of the School District and its employees in this regard. Specific concerns related to PAC communications are:

- The North Vancouver School District (NVSD) is not in a position to facilitate the electronic collection of email addresses for the PAC. The School District cannot absorb the risk that this type of electronic data exchange could pose to its information and communications systems.
- Connecting third parties to the School District's systems would create an undue risk for the NVSD and the information in its custody. For this reason, PACs do not have direct access to the data systems in the school district.
- If School District staff or administrators are involved in the collection or dissemination of personal information, they are required to follow the policies of the School District. They may help PACs by distributing or collecting forms on behalf of PACs. PAC data collection forms or websites should be clearly labeled as being for the PAC and it should be clearly stated that the PAC will be the custodian and user of the data.

## **Links:**

- PIPA online:
  - [http://www.bclaws.ca/civix/document/id/complete/statreg/00\\_03063\\_01](http://www.bclaws.ca/civix/document/id/complete/statreg/00_03063_01)
- BCCPAC Guide to PIPA:
  - [http://www.bccpac.bc.ca/sites/default/files/resources/volunteers\\_and\\_the\\_law.pdf](http://www.bccpac.bc.ca/sites/default/files/resources/volunteers_and_the_law.pdf)
- BCCPAC Leadership Manual Parent Involvement Basic Principles, (pages 12 – 14):
  - [http://www.bccpac.bc.ca/sites/default/files/resources/lm-tab1\\_parent\\_involvement-basic\\_principles\\_0.pdf](http://www.bccpac.bc.ca/sites/default/files/resources/lm-tab1_parent_involvement-basic_principles_0.pdf)
- Office of the Information and Privacy Commissioner - General guidelines:
  - <http://www.oipc.bc.ca/for-private-organizations.aspx>
- FIPPA online:
  - [http://www.bclaws.ca/civix/document/id/complete/statreg/96165\\_00](http://www.bclaws.ca/civix/document/id/complete/statreg/96165_00)
- CRTC summary of Canadian Anti-Spam Legislation:
  - <http://www.crtc.gc.ca/eng/casl-lcap.html>

### 3. Compliance with Canadian Anti-Spam legislation (CASL)

As of July 14, 2014, Canada's new anti-spam legislation (referred to as CASL), regulates the sending of all "electronic commercial messages," including emails which "encourage participation in commercial activity, whether or not there is an expectation of profit."

PACs will be directly affected by CASL because all emails which mention fundraising activities, or invite families to social events in which fees are charged to cover costs, fall under the jurisdiction of the legislation.

In order to comply with CASL, PACs must obtain separate informed consent on a paper form from all individuals on their email lists to be able to send out such commercial messages. This is different than collecting personal information for contact lists. When sending out PAC emails, always provide contact information and the option to unsubscribe from further correspondence.

- CRTC summary of Canadian Anti-Spam Legislation:
  - <http://www.crtc.gc.ca/eng/casl-lcap.html>

### 4. Best Practices for Electronic Communications

NVPAC recommends that PACs follow common guidelines regarding the appropriate use of email in order to communicate with parents in the School District.

#### General Guidelines:

- All outgoing emails must be read and approved by an officer of the PAC.
- All emails must be for school community use only—no commercial, political, or personal messages are appropriate.
- All emails must be circulated with addresses blind copied: **BCC** so that email addresses are not accidentally shared, which would be in violation of PIPA.
- Links are preferred to attachments.
- Attachments should be in a non-editable format, such as PDF, unless they need to be editable.
- Subject headers should be consistent and meaningful.
- Always include the source of the message (PAC, NVPAC etc.) in the subject line.
- Always provide contact information and an "opt-out" (unsubscribe) option on every email.
- Reduce random and excessive emails by sending out newsletters or information at regular intervals. Once-a-week emails covering several topics may be sufficient.
- Review broadcast emails with a school administrator to benefit from their experience in communicating with families and to ensure no duplication of school communications.

**BEFORE SENDING OUT AN EMAIL**, ask yourself:

- Is it clearly marked as a PAC communication?
- Are you utilizing bcc (blind copy)?
- Have you removed your auto signature (i.e. no job titles, company affiliations, or advertisements)?

- Does the email include contact information and an “opt-out” (unsubscribe) option?
- Is this information needed by all recipients?
- Is it concisely written in plain language so that a non-native speaker can understand it?
- Should it be translated and if so have you instructions for recipients that they can understand?
- Does it contain any sensitive or personal information requiring consent before issuance (e.g. pictures)?
- Does it duplicate any other communication from the PAC, District or school administrator?
- Is it factually correct?
- Is it repetitive; when was information on the topic last sent, does it meet the scheduled frequency?
- Are the attachments there if they are required?
- Do the links work?

## 5. Contact List Guidelines

**PACs must collect information for contact lists *independently of the school.***

- School staff cannot provide any personal information about parents or students collected by the school or School District to the PAC.
- School staff may help by distributing and collecting forms on behalf of the PAC, but it needs to be clearly stated that the PAC is requesting the data and the PAC will be responsible for its care.
- School District staff must be assured that the PAC is in compliance with PIPA.

**Contact collection forms:**

- It is good practice to review any forms with the principal prior to use, and also to explain how the collected data will be used, stored and ultimately destroyed.
- PACs should use a standard form, approved for use District-wide, when collecting personal information. This creates a documented clear record and provides the opportunity to ensure that the individuals from whom personal information is collected understand why the information is being collected. See Appendix A for a sample information collection template.

**Informed Consent:**

- Any request for personal information (including email addresses) necessitates “informed consent” by the individuals from whom the information is collected. They must understand the request according to all the elements of PIPA.
- If personal information is stored outside of Canada, the information may be subject to different laws in other countries. If collecting personal information that will be stored outside of Canada (e.g.: through Munchalunch) a PAC should include a statement informing parents of this fact on their forms.

**Secure records and disposal:**

- All records must be securely stored in order to comply with PIPA.
- In addition to proper collection of personal information for contact lists, PACs have a legal responsibility to destroy the records – both paper and electronic - when they are no longer in use.
- All permission forms and copies of the contact list should be destroyed at the end of every school year. New permission forms may be obtained and new contact lists generated in the new school

year. Although the annual practice of collecting essentially the same information from the essentially the same group of individuals may seem inefficient, it is the best way of ensuring compliance with PIPA.

## 6. Publication of Class Lists or School Directories

School-wide directories help foster a sense of school community but present privacy risks due to the sharing of contact information.

### Consent:

- In order for a PAC to publish such a directory, the consent of each family or individual whose personal information will be published must be obtained after a clear explanation of how the directory will be compiled and distributed. Such permission should be collected on a form separate from any other.

### Independent Publication:

- The PAC has a legal right to generate and publish a school-wide directory. In order to protect the School District and its staff from obligations under FIPPA, the project must be clearly “arm’s length” from the school. Any discussions about the possibility of a school-wide directory should involve the school principal and reflect their good judgment and direction. Explain the project, why is being undertaken and what steps are being taken to ensure that the project complies with PIPA.

### Personal Use Only:

- Published directories should have a reminder on each page indicating that the directory is to be used only by the families of the school for social and PAC purposes and that uses for business or other purposes are *not acceptable*.
- A statement forbidding copying or further distribution should also be included in the directory.
- Sometimes directories are suggested as fundraising initiatives for the PAC. Directories should never be sold, even as fundraisers, as this may compromise the use of personal information.

### Appendix A: A Sample Data Collection Form:

A sample template for contact information collection is provided on the following pages and should be edited to meet the specific needs of the PAC and school.

### Appendix B: A Sample Data Collection Form (with School Directory):

A sample template for contact information collection is provided on the following pages and should be edited to meet the specific needs of the PAC and school.

**[SCHOOL NAME] PARENT ADVISORY COUNCIL (PAC)**  
**CONTACT PERMISSION FORM FOR [CURRENT SCHOOL YEAR]**  
(please return by [DATE] to [LOCATION])  
[PAC EMAIL]

PACs play a vital role in schools and local communities, encouraging parent involvement in schools and assisting parents/guardians in supporting their children as students and members of the school community. All parents/guardians in a school community are members of the PAC. PACs have a responsibility to keep member-parents/guardians informed of their activities and initiatives.

The PAC will be establishing an email list and classroom telephone directories to be used for PAC purposes only. This is in accordance with the guidelines provided in the "NVPAC Communications Guidelines for PACs" developed by the NVPAC and School District Administration. This document may be accessed at <http://www.northvanpac.org/>. Along with suggested procedures for setting up and managing the PAC email network and directory, this document includes guidelines with respect to maintaining privacy, the frequency of communication, and ensuring that only appropriate school community content is distributed through these means.

This consent form is good for the current school year only and will be destroyed at the end of the school year. Your renewed consent will be sought annually at the beginning of each school year. PAC volunteers including the executive, event volunteers and class representative(s) will have access to this contact information. Your information will not be posted, shared or sold to third parties, and other than the School Directory, will not be published. If you have any concerns regarding accuracy, the use of, or the safe storage of the data the master list will be maintained by the PAC Chair or designate.

**PARENT EMAIL NETWORK:**

Emails will be used to keep parent/guardians up-to-date on local classroom, school, PAC and NVPAC sponsored activities and on matters affecting our broader educational community. Your email address will NOT be published but will be used to dispatch information through a classroom/PAC email fan-out structure within our school. If at any time you wish to opt out of receiving emails please reply to sender with your request.

**EMAIL COMMUNICATION**

- YES ~ I would like to receive classroom and PAC emails. *(as per contact information below)*
- NO ~ I do not want to receive classroom and PAC email communications.

**CLASSROOM TELEPHONE DIRECTORY:**

The PAC will also publish classroom telephone directories listing the names of students, their parents/guardians, and phone numbers. Your individual consent to be included in this class directory is required as indicated below.

**CLASSROOM TELEPHONE DIRECTORY**

- YES ~ I agree to have our names and phone numbers published in a Class Directory that is provided to other parents/guardians. *(as per contact information below)*
- NO ~ I do not agree to have our names and phone numbers published in a Class Directory that is provided to other parents/guardians.

**PHOTO RELEASE FORM:**

*\*Please note that school photo release information is not shared with PAC and so we kindly ask you to take a moment to complete this portion of the document.\**

From time to time photos of students may be taken at PAC events. Student's names, photographs and comments may be published in media such as a school yearbook, newsletter, programs, and PAC websites or in the news media on a controlled basis. Any such photographs would highlight the student(s) participation in PAC events only.

<b>PHOTO RELEASE</b>	
<input type="checkbox"/> YES ~	I agree to the publication of my child(ren)'s name(s), photographs and comments for purposes consistent with the above.
<input type="checkbox"/> NO ~	I do not agree to the publication of my child(ren)'s name(s), photographs and comments for purposes consistent with the above.

**CONTACT INFORMATION:**

Parent/Guardian's Name: \_\_\_\_\_

Email Address: \_\_\_\_\_ Phone No.: \_\_\_\_\_

Parent/Guardian's Name \_\_\_\_\_

Email Address: \_\_\_\_\_ Phone No.: \_\_\_\_\_

Student's First Name	Student's Last Name	Grade	Division	Teacher

Yes, I am interested in being a class rep or finding out more about being a class rep this year.

**By signing this document, I am confirming that all information in the document is correct.**

\_\_\_\_\_  
**Parent/Guardian's Signature is required.**

\_\_\_\_\_  
**Date**

**By signing this document, I am confirming that all information in the document is correct.**

\_\_\_\_\_  
**Parent/Guardian's Signature is required.**

\_\_\_\_\_  
**Date**

**[SCHOOL NAME] PARENT ADVISORY COUNCIL (PAC)**  
**CONTACT PERMISSION FORM FOR [CURRENT SCHOOL YEAR]**  
 (please return by [DATE] to [LOCATION])  
 [PAC EMAIL]

PACs play a vital role in schools and local communities, encouraging parent involvement in schools and assisting parents/guardians in supporting their children as students and members of the school community. All parents/guardians in a school community are members of the PAC. PACs have a responsibility to keep member-parents/guardians informed of their activities and initiatives.

The PAC will be establishing an email list and classroom telephone directories to be used for PAC purposes only. This is in accordance with the guidelines provided in the "NVPAC Communications Guidelines for PACs" developed by the NVPAC and School District Administration. This document may be accessed at <http://www.northvanpac.org/>. Along with suggested procedures for setting up and managing the PAC email network and directory, this document includes guidelines with respect to maintaining privacy, the frequency of communication, and ensuring that only appropriate school community content is distributed through these means.

This consent form is good for the current school year only and will be destroyed at the end of the school year. Your renewed consent will be sought annually at the beginning of each school year. PAC volunteers including the executive, event volunteers and class representative(s) will have access to this contact information. Your information will not be posted, shared or sold to third parties, and other than the Class and School Directories, will not be published. If you have any concerns regarding accuracy, the use of, or the safe storage of the data the master list will be maintained by the PAC Chair or designate.

**PARENT EMAIL NETWORK:**

Emails will be used to keep parent/guardians up-to-date on local classroom, school, PAC and NVPAC sponsored activities and on matters affecting our broader educational community. Your email address will NOT be published but will be used to dispatch information through a classroom/PAC email fan-out structure within our school. If at any time you wish to opt out of receiving emails please reply to sender with your request.

**EMAIL COMMUNICATION**

- YES ~ I would like to receive classroom and PAC emails. *(as per contact information below)*
- NO ~ I do not want to receive classroom and PAC email communications.

**CLASSROOM TELEPHONE DIRECTORY:**

The PAC will also publish classroom telephone directories listing the names of students, their parents/guardians, and phone numbers. Your individual consent to be included in this class directory is required as indicated below.

**CLASSROOM TELEPHONE DIRECTORY**

- YES ~ I agree to have our names and phone numbers published in a Class Directory that is provided to other parents/guardians. *(as per contact information below)*
- NO ~ I do not agree to have our names and phone numbers published in a Class Directory that is provided to other parents.

**SCHOOL DIRECTORY:**

The PAC will also publish a school directory listing the names of students, their parents/guardians, phone numbers and addresses. Your individual consent to be included in this class directory is required as indicated below. Many find it helpful for planning activities with classmates, and it can be a handy reminder for parent names, too. We have found it is a reasonable way to balance privacy while still building our school community.

**Directory Sample:**

Grade 1	Mrs. Heaton		Div 12	
Last Name	First Name	Telephone	Address	Parent/Guardian
Flintstone	Pebbles	604-888-9999	1234 Rubble Way	Wilma & Fred



**SCHOOL DIRECTORY**

<input type="checkbox"/> YES ~	I agree to have my child(ren)'s name(s), phone number(s) and address published in a School Directory that is provided to other parents/guardians. <i>(as per contact information below)</i>
<input type="checkbox"/> NO ~	I do not agree to have my child(ren)'s name(s), phone number(s) and address published in a School Directory that is provided to other parents/guardians.

**PHOTO RELEASE FORM:**

*\*Please note that School Photo Release information is not shared with PAC and so we kindly ask you to take a moment to complete this portion of the document.*

From time to time photos of students may be taken at PAC events. Student's names, photographs and comments may be published in media such as a school yearbook, newsletter, programs, and PAC websites or in the news media on a controlled basis. Any such photographs would highlight the student(s) participation in PAC events only.

<b>PHOTO RELEASE</b>	
<input type="checkbox"/> YES ~	I agree to the publication of my child(ren)'s name(s), photographs and comments for purposes consistent with the above.
<input type="checkbox"/> NO ~	I do not agree to the publication of my child(ren)'s name(s), photographs and comments for purposes consistent with the above.

**CONTACT INFORMATION:**

Parent's/Guardian's Name: \_\_\_\_\_

Email Address: \_\_\_\_\_ Phone No.: \_\_\_\_\_

Parent's/Guardian's Name \_\_\_\_\_

Email Address: \_\_\_\_\_ Phone No.: \_\_\_\_\_

Student's Address: \_\_\_\_\_

Student's First Name	Student's Last Name	Grade	Division	Teacher

*Yes, I am interested in being a class rep or finding out more about being a class rep this year.*

**By signing this document, I am confirming that all information in the document is correct.**

\_\_\_\_\_  
Parent's/Guardian's Signature Date

**By signing this document, I am confirming that all information in the document is correct.**

\_\_\_\_\_  
Parent's/Guardian's Signature Date

**APPENDIX C**

The following summary of roles and responsibilities is provided to assist Parent Advisory Councils and Administrators in ensuring that the collection, maintenance and distribution of personal information by PACs is in compliance with the regulations of PIPA and following best practices.

**Summary of Roles and Responsibilities:****NVPAC**

- Distribute (to PACs), maintain and update (as needed) guidelines document
- Post guidelines document to NVPAC website
- Provide training and support as needed
- Encourage PACs to have a dedicated communications volunteer
- Provide support to PACs in terms of understanding their legal requirements with respect to personal information protection

**NVSD administration**

- Provide review and input to guidelines and consent forms
- Circulate approved guidelines to principals

**School administration**

- Maintain awareness of these guidelines
- Maintain awareness of the requirements of PIPA and the differences to FIPPA.
  - Specifically be aware that PACs are organizations separate from the school and as such are subject to PIPA with regard to the handling of personal information.
- Recognize the legal independence of PACs and that they are entitled to collect and use personal information including email lists for PAC activities.
- Ensure PACs do not duplicate school communications.

**School PAC Chair**

- Approve and disseminate PAC emails and other messages to PAC communications volunteers and/or class reps
- Customize PAC contact permission form for the school
- Ensure compliance of all PAC practices with applicable laws--specifically PIPA.
- Maintain responsibility for overall adherence to the guidelines at the school
- Monitor and collaborate in managing any emergent issues with the school principal
- Ensure PACs do not duplicate school communications.