



SECTION C). EDUCATIONAL EXPERIENCE AND SCHOOL ADMINISTRATION

This section of the Academy's policy covers off school experience touching on

1. *Field trips, offsite experiences*
2. *School clubs*
3. *Graduation Program*
 - *Dogwood Diploma*
 - *Adult Graduation Program*
 - *Evergreen Certificate*
 - *Student Staying Past School Age*
4. *Educational Resource Policy*
5. *Learning Support and Special Education at the Academy*
 - *Learning Support Services*
 - *School Completion Certificates – Evergreen Stream*
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C1). Field Trips / Offsite Experiences

Saint John Paul II Academy recognizes that off-site experiences outside the school/parish community are effective learning experiences that enrich the spiritual, intellectual, social, emotional and physical development of students.

Saint John Paul II Academy requires that all activities that take place off-site from the school/parish be selected, planned, organized and conducted to enhance the spiritual, intellectual, social, emotional or physical development of students and to ensure the safety and security of all participants.

Procedure: Prior to authorizing field trips and off-site experiences, the school administrator will make staff aware of all relevant policies and procedures. Staff should also familiarize themselves with the *YouthSafe Outdoors: Off-site Experience Safety for BC Schools* resource manual¹. The purpose of the manual is to enhance effectiveness, efficiency, and economy of effort, and to provide best practice risk management strategies.

Teachers wishing to organize a field trip must first obtain the approval of the Principal by submitting a written proposal that includes

- field trip goals and objectives
- relationship to the curriculum and/or school mission, vision, philosophy
- description of how the trip is appropriate for students of the proposed age/grade and level of preparation

¹ Note: all forms referenced in this Policy are available in the *YouthSafe Outdoors* manual available at the school.



- statement of potential risks to participants
- budget

The *YouthSafe Outdoors* resource manual includes various off-site experience proposal forms to be used along with other useful resources to assist organizers in planning an excursion. Any school developed off-site experience proposal form used must meet or exceed the standard of safety and preparation as identified by *YouthSafe Outdoors* resource manual.

Approvals

Prior to planning a field trip or off-site experience the organizer should consult the *YouthSafe Outdoors* manual to determine the level of risk associated with undertaking such an activity. By first assessing the level of risk entailed the organizer will be in a better position to decide the appropriate proposal form to complete to obtain the relevant level of permission. The manual generally distinguishes between low risk activities versus higher care outings where the level of advance planning and preparation is greater.

Category of Field Trip	Description	Approval Required
Same Day	Prior authorization by the Principal or his/her designate must be given for each activity by submitting the appropriate form found in the <i>YouthSafe Outdoors</i> manual (generally same day trips are deemed low risk, however, depending on the activity it may fall into the higher risk category – aquatic activities for example). Approval from the Board is not required.	Principal
Multiple Day	Multiple Day Field Trips: Prior authorization by the Principal or his/her designate must be given for each activity by submitting the appropriate form (such as Offsite Experience Proposal Form A – Local, Low-risk Daytrip; Offsite Experience Proposal Form B – Higher Care Outings) designed for this purpose. Approval from the Board is not required.	Principal
Outside Province	Prior authorization by the Principal or his/her designate must be given for each activity by signing the appropriate form (i.e., Detailed Trip Plan Form) designed for this purpose. Approval from the Board is required and must be obtained prior to finalizing arrangements for such trips (i.e., before booking travel, undertaking fund-raising, making financial commitments, etc.). The request must include contingency plans for emergencies and medical emergencies.	Society Board
Out-of-country	Prior authorization by the Principal or his/her designate must be given for each activity by signing the appropriate forms (i.e., Detailed Trip Plan Form) designed for this purpose. Board approval is required and is done through the Principal prior to finalizing arrangements for such trips (i.e., before booking travel, undertaking fund-raising, making financial commitments, etc.). The request must include contingency plans for all emergencies, including those caused by political unrest, medical emergencies, and student disciplinary action. All necessary documentation (passports, visas, etc.) are to be applied for <u>only after</u> approval is given. Participants must have adequate medical coverage for the country/countries to be visited. Student trips should not be planned to countries or regions of countries where there is a possibility of an outbreak of social unrest.	Society Board



High-Risk Field Trips: All field trips deemed to be “High-Risk” according to *YouthSafe Outdoors* guidelines require Board approval.

Considerations Regarding Participation: The following considerations apply to participation by students in off-site experiences:

- The suitability of the activity to the students (ie., age appropriateness; fitness, skill levels)
- The voluntary nature of field-trip participation
- The cost per student
- The provision of meaningful alternative activities for students unable to participate

All students, including special needs students, should have every opportunity to participate in school activities to the best of their ability, including all field trips. Every effort must be made to accommodate individuals with special needs. The Principal is responsible to ensure that adequate planning and preparations are made for all students to participate.

Trip Plan: Sufficient direction and guidance must be provided to ensure each trip is well planned with safety in mind.

For organized low-risk field trips, the following procedures apply:

A completed *Off-Site Experience Proposal - Form A* (or equivalent) should be submitted to the Principal for approval a minimum of two weeks prior to the proposed trip.

For organized high-risk field trips the following procedures apply:

A completed *Off-Site Experience Proposal - Form B* (or equivalent) should be submitted to the Principal for approval no less than two weeks and in sufficient time to allow for Board approval, prior to the trip. The teacher/leader is required to complete a *Detailed Trip Plan (or equivalent)* for all high-risk field trips. The Principal may require a teacher/leader who has requested to take students on a high-risk activity to complete a *Teacher/Leader Readiness* to assess the teacher’s/leader’s capability to instruct or lead a given activity.

The Principal may require a teacher/leader who has requested to take students on a high-risk outdoor leadership activity to complete an *Itinerary Card* to help establish the appropriateness of an outdoor leadership activity.

Parent/Guardian Consent and Acknowledgement of Risk Forms: teachers planning an off-site trip are required to provide parents/guardians sufficient information about the trip to make an informed decision about its appropriateness and safety for their child. Teachers/Leaders should use the *Off-Site Activity Consent and Acknowledgement of Risk form (or equivalent)* for local low-risk activities. Teachers/Leaders should use the *Off-Site Activity Consent and Acknowledgement of Risk form (or equivalent)* for high-risk activities.

Supervision

Head Teacher: When more than one class is on an excursion, one teacher will be designated “Head Teacher”. The Head Teacher shall be responsible to ensure that all students on the excursion are



assigned to specific vehicles. Roll call to identify each student by name and sight shall be taken as often as deemed necessary by the Head Teacher. A head count shall not be considered sufficient to identify students. Roll call shall take place at every departure point in the field trip itinerary. The names of all students shall be logged and copied to the school office. Any changes on route shall be logged and communicated to the school office. The Head Teacher shall remain at the terminus of the excursion until all returning students are accounted for.

Field trips should, whenever possible, have a minimum of one supervisor for every 15 students. A higher *supervisor: student* ratio may be required depending on the nature of the trip and the age and needs of the participating students.

An adult supervisor may be a teacher, parent, or responsible adult volunteer approved by the Principal who is 19 years of age or older and is a minimum of 3 years older than the students being supervised and has a Criminal Records Check (CRC) in place. All overnight fieldtrips must have at least one (1) staff-member and one additional adult supervisor. All overnight field trips require that at least one (1) supervisor be of the same gender as the field trip participants.

Student supervisory assistants must be

- a minimum of 16 years of age,
- be a minimum of 3 years older than the students being supervised and may only be used to provide additional program support. They are not considered to be supervisors for the purpose of determining acceptable supervision ratios.

All supervisors are subject to policies, guidelines, and procedures of Saint John Paul II Academy, and the statutes of BC and Canada during the time the supervisor is responsible for students. This includes the period from departure to return of extended field trips.

A supervisor must act *in loco parentis* (in place of parent), making wise and judicious decisions that are in the best interest of the students.

- When a specified training certification is required as part of an educational field studies excursion, the Principal shall ensure that the instructor/supervisor possesses such a designated certificate;
- A supervisor shall attempt to contact the school and/or students' parents in a case of an accident but, failing to do so, shall take whatever steps are necessary to care for the students;
- A supervisor shall report all accidents to the Principal at the earliest possible opportunity. All accidents will require a written report of the incident(s).
- A minimum of one supervisor per school bus must be provided, in addition to the driver when students are being transported to and from the field trip destination.
- All motor vehicle safety requirements must be followed (seatbelts, etc.)
- Everyone involved in the trip or excursion must be dressed/equipped in a manner appropriate to the activities.



C2). School Club Organizations

The clubs and organizations addressed in this policy pertain to clubs/organizations with the specific goal of providing leadership in anti-bullying (i.e. school anti-bully squads, outreach teams), connecting teens in a positive social environment, creating a positive school culture, promoting student governance (i.e. student parliament or student council).

Saint John Paul II Academy supports promoting clubs and organizations within the school that create a positive school culture that is inclusive of all students.

Procedure: Clubs/organizations with the purpose described above:

- Must have the approval of the Principal
- Must have a teacher or administrator appointed adult sponsor.
- Are to be founded and guided by a Christian anthropology, that is, a correct understanding of who the human person is which includes a defense of human rights, but also attributes to the human person the dignity of a child of God and proposes Christ, Incarnate Son of God and perfect Man, as both model and means (see 'Holy See's Teaching on Catholic Schools' – Archbishop J. Michael Miller, CSB)
- Are to be imbued with a Catholic worldview of social action and social justice. Catholic education whether in the classroom or in a club/organization format is intentionally directed to the growth of the whole person. Clubs/organizations with a focus on the dignity of and respect for the human person would include the development of all the human faculties of students, and the formation of social and ethical awareness inspired and guided by the gospel.

C3). Graduation Program

There are two paths students at the Academy will follow in order to complete their secondary school graduation. They include what are popularly known as either the Dogwood or Evergreen streams.

i) British Columbia Certificate of Graduation (Dogwood Diploma)

The British Columbia Certificate of Graduation or Dogwood Diploma is awarded to students who successfully complete the provincial graduation requirements. Students require a minimum of 80 credits to graduate. Of these 80 credits

- at least 16 must be at the grade 12 including a required Language Arts 12
- at least 28 credits must be elective course credits
- 52 credits are required from the following:
 - Career-Life Education (4 credits), and Career Life Connections (4 credits)
 - Physical and Health Education 10 (4 credits)
 - Science 10 (4 credits) and Science 11 or 12 (4 credits)
 - Social Studies 10 (4 credits) and a Social Studies 11 or 12 (4 credits)
 - Math 10 (4 credits) and the Math 11 or 12 (4 credits)
 - Language Arts 10, 11 and a required 12 (12 credits total)
 - An Arts Education 10, 11, or 12 and/or an Applied Design, Skills, and Technologies 10, 11, or 12 (4 credits total).



In addition, students must also complete three graduation assessments: grade 10 graduation numeracy assessment and grade 10 graduation literacy assessment and grade 12 graduation literacy assessment.

ii) British Columbia Adult Graduation Diploma (Adult Dogwood)

To complete the Adult Graduation Program, students (18 years of age and older) must earn at least 20 credits in the secondary system or complete five courses in the post-secondary system. Courses and credit can be counted from the BC School System and/or College ABE Program.

iii) British Columbia School Completion Certificate (Evergreen Certificate)

The British Columbia School Completion Certificate is awarded to students who meet the goals of their education program. This can include students with IEPs who do not meet the criteria for graduation as outlined in the *Provincial Graduation Order* and who are not issued a Dogwood Diploma. Students in this track work on their school completion Evergreen Certificate rather than a Dogwood Diploma.

The decision to place a student in the Evergreen stream should not be made prior to Grade 10 and should include the informed consent of the student's parent(s)/guardian(s). A student's transition to the Evergreen track at the Academy can happen at any time in his/her high school career although it is recommended that a student transition at grade 10 before entering their senior years of secondary school.

Additional details on the Evergreen stream are found in the next section covering Learning Support and Special Education at the Academy.

iv) Students Staying Past School Age

There are occasions where a student turns 19 years of age while in their final year of study.

If a student is staying past school age to complete either a B.C. Certificate of Graduation (Dogwood) or School Completion (Evergreen) the school will document a rationale and supporting documents for the student needing to stay past school age at Saint John Paul II Academy, and the principal will be aware of the documentation:

- Rationale and purpose for student's extended timeline
- Proposed duration or timeline completion
- A neurological profile (if needed)
- Current IEP goals/objectives (if the student has one)
- Type of support that the student currently receives
- A description of the student's courses
- Next year's IEP goals/objectives
- Type of support that is needed for the proposed extended timeline

Considerations are different for a student working towards a Dogwood graduation in comparison to a student working towards an Evergreen school completion.



C4). Educational Resource Policy

Rationale

As required by the Ministry of Education, it is the responsibility of the local school authority to set out its policy and procedures followed in determining how learning resources are chosen for use in the classroom. The policy that follows sets out how this is done at St. John Paul II Academy.

Definition

Learning resources are texts, video, software and instructional materials that teachers use to assist students to meet the requirements for learning defined by the Ministry and St. John Paul II Academy.

Policy

Learning resources that are used in the classroom will be evaluated and approved with due consideration given to curriculum fit, pedagogy, social considerations, age and developmental appropriateness and conformance with Church teaching of St. John Paul II Academy's overall mission and purpose. St. John Paul II Academy requires teachers to utilize core education media that has been formally evaluated before being introduced to the classroom. This evaluation process involves one or more of the following oversights:

Review by at least two school representatives (teacher, department head, principal, or subject peer group) with three or more years teaching experience at St. John Paul II Academy, preferably in the grade level and subject area for which the resources are to be used.

At the discretion of the Society Board to review materials that relate to common learning resources and materials used at St. John Paul II Academy.

For learning resources (ie, textbooks, programs, etc.) relating to the provision of Christian education taught at St. John Paul II Academy, review by the Principal of all core learning resources is required

The evaluation criteria applied in determining suitability for classroom use includes but is not limited to the following:

- Supports and is in conformance with Church teaching, our Catholic worldview and rich intellectual tradition
- Encourages and promotes the full dignity of the human person and responsible citizenship
- Supports the learning objectives of the curriculum
- Assists students in making connections between what they learn in the classroom and its application in their lives
- Is age and developmentally appropriate
- Shows responsible scholarship and effective instructional design
- Meets requirements set by copyright and privacy legislation

Supplemental Materials

There is an expectation of all teaching staff that any supplemental materials introduced for use in the classroom support the above criteria. This includes accessing and using online resources. Teachers have



a unique responsibility to ensure that such materials serve and reinforce these objectives. It is critical that learning resources be periodically reviewed to ensure continued relevance to the curriculum being taught.

Appeals

Parents wishing to challenge the use of a particular learning resource used on the basis of appropriateness may take this up with the Principal of the school. Should the issue not be satisfactorily the major complaints policy should be followed.

C5). Learning Support and Special Education at the Academy

Saint John Paul II Academy is a Christian community committed to the goal of being an inclusive community of learners to accept, support and meet the diverse needs of our students. Our commitment to students of special needs is inspired and guided by the words of Pope John Paul II spoken at B.C. Place in 1984, “the value and dignity of the human person does not arise from the physical or mental qualities, from efficiency, productivity, or speed in one’s actions. It comes rather from the fundamental fact that each individual is created by God and redeemed by the blood of his Son, Jesus Christ.”

The Academy is committed to helping all students be successful in their learning. We strive to create an inclusive and diverse special education program that focus on a holistic approach to the individual’s learning. Inclusion describes the principle that all students are entitled to equitable access to learning, achievement, and the pursuit of excellence in all aspects of their education. It goes beyond integration and placement to include meaningful participation and the promotion of interaction with others.

Integration is one of the major strategies used to achieve inclusion. With integration, students with special needs are included in educational settings with their peers who do not have special needs and provided with the necessary accommodations determined on an individual basis, to enable them to be successful there. The principle of ‘placement in the most enabling environment’ applies when decisions are made about the extent to which an individual student is placed in regular classrooms or assigned to an alternate placement.

The policy includes our approach to special education at the Academy and includes school completion certificates, the learning support and resources available and follows the Ministry of Education and Child Services’ “Special Education Services: A Manual of Policies, Procedures and Guidelines” (April 2016).

Procedure: Through collaboration and meaningful consultation with teachers, parents, Education Assistant and the student concerned, an Individual Education Plan (IEP) is prepared that focuses on functional academics, functional life skills, vocational skills and physical literacy. We develop



supplemental² and/or replacement curricular goals³ where needed that is adapted to the student's level of learning. Professional resources such as occupational therapy, educational psychologists, speech language services, expressive art therapy and access to support from provincial resource programs may be needed for students as part of their IEP.

Consistent with this policy is an effort (within financial feasibility) to make our facilities accessible for students with special needs.

i) Learning Support Services at the Academy

As required by the Ministry of Education and Child Services, it is the responsibility of the school authority to set out its policy and procedures followed in determining how learning resources are chosen for use in the classroom.

Learning supports are texts, video, software and instructional materials that teachers use to assist students to meet the requirements for learning defined by the Ministry and Saint John Paul II Academy. Learning resources that are used in the classroom will be evaluated and approved with due consideration given to curriculum fit, pedagogy, social considerations, age and developmental appropriateness and conformance with Church teaching and the overall mission and purpose of Saint John Paul II Academy.

Saint John Paul II Academy requires teachers to utilize core education media that has been formally evaluated before being introduced to the classroom. This evaluation process involves one or more of the following oversights:

- Review by at least two school representatives (teacher, department head, principal, or subject peer group) with three or more years teaching experience, preferably in the grade level and subject area for which the resources are to be used.

At the discretion of the Principal, to review materials that relate to common learning resources and materials used in Catholic schools in the Archdiocese. The evaluation criteria applied in determining suitability for classroom use includes but is not limited to the following:

- Supports and is in conformance with Church teaching, our Catholic worldview and rich intellectual tradition
- Encourages and promotes the full dignity of the human person and responsible citizenship
- Supports the learning objectives of the curriculum

² Supplemental curriculum Goals: are in addition to grade level curricular competency learning standards. These goals are intended to support skill development towards improvement of curricular goals, which are not/may not yet be at grade level. Supplemental goals are targeted towards an individual's needs in a particular curricular area.

NOTE: A student may have a specific supplemental curricular goal in addition to the ability to meet current grade level curricular standards in a course.

³ Replacement Curricular Goals: are instead of current grade level curricular competency learning standards. When the curricular learning standards change for a given course/curricular subject, replacement goals are created. Replacement goals replace curricular learning standards which can change graduation trajectory.



- Assists students in making connections between what they learn in the classroom and its application in their lives
- Is age and developmentally appropriate
- Shows responsible scholarship and effective instructional design
- Meets requirements set by copyright and privacy legislation

Supplemental Materials: There is an expectation of all teaching staff that any supplemental materials introduced for use in the classroom support the above criteria. This includes accessing and using online resources. Teachers have a unique responsibility to ensure that such materials serve and reinforce these objectives.

It is critical that learning resources be periodically reviewed to ensure continued relevancy to the curriculum being taught.

Appeals: Parents wishing to challenge the use of a particular learning resource used on the basis of appropriateness may take this up with the Principal. Should the issue not be satisfactorily resolved the Major Complaints policy is to be followed (see Section F – complaints section of school policy).

ii) School Completion Certificates – Evergreen Stream

The Evergreen stream at the Academy is designed for students to prepare them for success after high school through a Life Skills program. The Life Skills program encourages students to learn skills (with support) toward independence following their IEP goals. Students will participate in a variety of activities to increase their knowledge and self-esteem inside and outside the classroom. The program is set up into four competencies, and four achievement levels (based in the student's IEP goals/ PATH) that connects to the four life skill strands (Faith Development, Functional Academic, Functional Life Skills, and Physical Literacy). Students also address the core areas of coursework through Ministry authorized, Board/ Authority Authorized (BAA), Locally Developed, Adapted and Modified courses in accordance with their IEP.

Four Levels of Competency	Achievement Level
Exceeding <ul style="list-style-type: none">• able to perform a higher level of thinking on the learning outcomes (s/he is perceptive; his/ her performance is accurate, extensive, sophisticated and consistently appropriate)	4 Independent 3 Verbal and Visual Prompt
Proficient <ul style="list-style-type: none">• Able to perform with some higher level thinking on the learning outcomes (s/he is thoughtful; his/her performance show some sophisticated knowledge, with a considerable degree of accuracy)	
Developing	



<ul style="list-style-type: none"> • Able to perform with adequate level of thinking on the learning outcomes (s/he shows some degree of learning outcome knowledge with some degree of accuracy). 	2 Partial Physical Assistance 1 Full Physical Assistance
Emerging <ul style="list-style-type: none"> • Able to perform some limited level of thinking on the learning outcome (s/he shows minimal degree of learning outcome knowledge with limited accuracy). 	

British Columbia Completion Certificate (Evergreen Certificate) Broad and Specific Strands	
Faith Development <ul style="list-style-type: none"> • This strand focuses on exploring and understanding the basic traditions of our Catholic faith. The student achieves knowledge by experiencing their faith in action through volunteer work, participating in prayer, and attending mass. In the classroom, students participate in Christian education classes. 	
Functional Academics <ul style="list-style-type: none"> • This strand focuses on the academic knowledge and skills that are necessary for a student to live independently in their post secondary lives. With a focus on numeracy and literacy that relate to real world and everyday experiences, functional academics provides students the framework to be able to complete basic tasks independently, and at the higher level outcomes, learn skills necessary for meaningful employment after secondary school. 	
Functional Literacy <ul style="list-style-type: none"> • This specific strand of functional literacy focuses on reading, writing, communicating, and understanding the English Language. Learning to read a newspaper, Internet, a map, or a menu is the focus of this most basic level of the functional literacy strand. It focuses on reading and understanding short stories, a novel, comprehending information read, and answering the four W's. exploring the world around them, and the various media and texts that it encompasses it's also part of this strand, developing critical thought and becoming a more knowledgeable member of society. 	
Functional Numeracy <ul style="list-style-type: none"> • Functional numeracy is the life skills program that focuses on basic mathematics skills necessary to live independently, such as counting, adding and subtracting, using money, budgeting finances (banking, value of money), and understanding time. Learning about money as it applies to the workplace is also part of the curriculum. The functional numeracy goals are set based on a student's IEP. 	
Vocational Skills <ul style="list-style-type: none"> • Vocational skills such as writing a cover letter and a resume fall under the vocational skills strand. Students learn how to dress and act professionally, how to ask and answer appropriate interview questions, and explore a variety of careers that they may be interested in based on their IEP goals and PATH. 	

School Completion Portfolio: The Academy will develop a School Completion Portfolio for all students working toward an Evergreen Certificate that records the completion of coursework and IEP learning outcomes, demonstrates related skills, achievements, and qualifications of the student.



A student's entrance to the Evergreen track (Saint John Paul II Academy Life Skills program) is a team-based approach that involves the school administration, learning support teacher, academic teachers, Education Assistant's, and parent(s)/guardian(s). A significant need to replace courses specifically English and Mathematics are taken into consideration when a student enters the Life Skills Program, and a transition to the Evergreen track is noted on the student's IEP.

1. The *School Completion Portfolio* will address the core areas of coursework including:
 - a. Ministry authorized courses,
 - b. Board/Authority Authorized (BAA),
 - c. Locally Developed (LD)
 - d. Adapted Courses
 - e. Modified Courses
2. The *School Completion Portfolio* should also address the areas of:
 - a. Faith Development
 - b. Art and Design
 - c. Community Involvement and Responsibility
 - d. Education and Career Planning
 - e. Employability Skills
 - f. Information Technology
 - g. Personal Health
3. Schools will develop assessment criteria for courses and other areas within the School Completion Portfolio from which student grades will be determined.
 - a. Schools will report all Grades 10, 11, and 12 courses successfully completed, credits earned and achievement levels attained to the Ministry of Education at the end of each school year. Schools are to report on student progress using percentages and letter grades for all curricular areas for all students.
 - b. Educational staff, in consultation with the principal, will determine if a student has met the requirements of the School Completion Portfolio.
 - c. When a student has successfully completed the requirements of the School Completion Portfolio, the school will submit the relevant data for the student to the Ministry of Education, including the date by which the student met the goals of his or her program. The school will recommend that the student be issued a School Completion Certificate.

Planning Alternative Tomorrows with Hope (PATH): The Academy will initiate and complete a PATH for all students working toward a school completion Evergreen Certificate. The PATH will provide students with further direction and clarity to assist them in setting goals as they transition out of secondary school..

C6). Student Records

As an independent school in the province, Saint John Paul II Academy takes seriously its obligations of duty of care as it relates to the collection, storage, retrieval, confidentiality, and access to how a Student Record is managed. This policy outlines how the Academy's policy aligns with the requirements for



Student Records under the Independent Schools Act of the province of BC⁴ and Personal Information Privacy Act (PIPA)⁵. It also follows the guidance jointly issued by the Ministry of Education Independent Schools Office and the Federation of Independent Schools Association of BC⁶ on Student Records. Saint John Paul II Academy is committed to ensuring that student records are handled in accordance with these regulations and are consistent with the requirements under PIPA. The policy that follows outlines how the Academy meets these requirements.

The Society board may, from time to time, add, modify, or remove portions of the Saint John Paul II Academy's Student Records policy when it is considered appropriate to do so and is not in conflict with legal requirements and government policy.

Guiding Principles

The following outlines and informs the requirements and obligations of all stakeholders who collect, use, store and protect student information.

- The Academy will ensure that the lead administrator (principal) is responsible for the establishment of the Student Record, its security and maintenance following the procedures outlined in this document.
- That the collection, use or disclosure of personal information contained in this record is done with the consent of the individual, parent or legal guardian unless otherwise authorized under PIPA save for professionals who are planning for, or delivering education, health, social or other support services to that student (consent not required for record access).
- Disclose to the individual, parent or legal guardian verbally or in writing the purpose for which the record is required and used.
- Only collect and disclose the information required under the Student Records Order for the purposes that a reasonable person would consider appropriate in the school context and would do so in a manner consistent with requirement under PIPA.
- Ensure that these records are stored and secured in the manner prescribed under the Student Records Order and are released to those individuals who by the nature of their work are required to have access to this information.
- Provide access to a student able to exercise their PIPA rights, parent or legal guardian of this student on site under supervision by the principal or his or her appointed delegate.
- Ensure that the record is retained for the period stipulated in the Student Records Order
- Take steps to ensure that the Academy's personal information handling policies and protocols are communicated to the wider school community and that any complaints or questions about personal information are directed to the Academy's privacy officer (ie, principal). Major complaints would follow the process outlined in the Academy's Complaints policy (see Section F of the Academy's body of school policy).

Use of Student Personal Information

⁴ see The Independent School Act (section 6.1), section 9 of the Independent School Regulation (the Regulation) , and the Student Records Order (I1/07), Ministry of Education and Child Care, Education Policy Branch.

⁵ PIPA came into effect 1 January 2004.

⁶ See Ministry of Education Independent Schools office, "Requirements and Best Practice Guidelines for Independent Schools Developed in Consultation with the Federation of Independent Schools Association", July 2012 (updated July 2021).



The Academy may use personal information for the following purposes:

- To communicate with parents or legal guardians and students, to process applications, and to provide students with the educational services and co-curricular programs provided at the Academy.
- To enable the Academy to operate its administrative function, including the payment of fees and maintenance of extracurricular programs at the Academy.
- To provide specialized services in the areas of health, psychological or legal support, or as supporting information in delivering educational services that are deemed in the best interest of the student.

Student Record Components

Components of a Student Record include:

- The most recent Form 1704 entitled “Permanent Student Record” issued by the Ministry of Education. This means the following:
 - Form 1704 completed in accordance with the Ministry’s “Permanent Student Record Completion Instructions” that prevail at the time of completion
 - The student’s progress reports for the previous two (2) years or a copy of the transcript of grades issued by the Ministry of Education
 - Completed Form A verifying the information about the student’s parent or legal guardian in respect to student eligibility for funding.⁷
 - Student Learning Plan, which is the learning plan set out in the Career and Personal Planning 8 to 12 Integrated Resource Package (1997) educational program guide
- A copy of the student’s Individual Education Plan (IEP), if applicable, as defined in the Ministry’s Education Standards Order order 41/91.
- Further, the Academy will ensure that the file also includes the following as required under section 9(1) of the Independent School Regulation:
 - The permanent Student Record
 - File contains all documents listed as inclusions on Form 1704
 - Documentation verifying the parent/ legal guardian’s eligibility for government funding
 - A copy of the student’s current Student Learning Plan (if any)
 - Copy of the student’s IEP (if applicable) and/or Case Management Plan (where applicable)
 - Health services information containing relevant information on any medical alerts, allergies, medical conditions that may require emergency care.
 - Court orders and their rescinding date (if applicable)
 - Other legal documents (eg, immigration status, change of name)
 - Support service information such as psychometric assessments, speech and hearing tests, adjudication requirements for completing assessment activities
 - Notification of the student being home school (where applicable)

⁷ Form B is to be used in cases where the parent/ legal guardian is deceased but had established legal residency to qualify for Ministry of Education funding.



Additional Information – Student File

There is additional information that may be included in the Student Record. This information differs from what is required to be included in the Permanent Student Record and the Academy may decide to include in the Student Record other such documentation in addition to that required by the Student Records Order. These documents are not to be transferred to other schools when the student leaves the Academy. This may include:

- Legal name of the child, birth certificate or similar identification document
- Names and contact details of parents or legal guardian, emergency contact information
- Verification that the parents or legal guardian has been legally admitted to Canada and is a resident of BC
- Care Card number
- Family doctor's and/or specialists' contact information
- Serious discipline reports that include the corrective measures taken; reports of important meetings between the school and the parents or legal guardian relating to the student
- Standardized test scores, record of information which an educator deems relevant and important to the education of the student and any award information that is not part of the Permanent Student Record

Sensitive Student Information: this requires a high degree of confidentiality in how such information is handled by school staff. Examples include: counselling reports, psychiatric reports, family assessments; record of school initiated report of alleged sexual or physical abuse made to a child protection social worker.

The Academy's principal is responsible to ensure that consent has been received to collect, access, store, disclose and transfer sensitive documents in accordance with the law as defined in section 14 of the *Child Family and Community Services Act*.

Examination of Student Records

A student and the parents or legal guardian of a student of school age are entitled to:

- i. on request and while accompanied by the principal or his or her delegate designated to interpret the records, to examine all student records kept by the Academy pertaining to that student.
- ii. The Academy may request and levy a fee to issue a copy of the Student Record they are entitled to examine under section (i) above.

Retention of Student Records

Under section 5(1) and 5(3) the Academy is required to retain a Student Record for a period of not less than fifty-five (55) years. From the date the student withdraws or graduates from the Academy.

Transfer of Student Records



- The Academy will transfer the Student Record, the current student learning plan (if any) and the IEP (if any) for a student upon receipt of a request from the school authority where the student has transferred and is enrolled or to the board where the student is enrolled.
- Where a former student of the Academy is enrolled with an educational institution outside the province of BC and receives a request for this Student Record from that education institution.
- Within 60 days of closing the Academy would transfer to the Inspector the Student Record of any student that has not been forwarded to another educational authority or board in British Columbia.

Student Records Disclosure

- i. The Academy will disclose the Student Record kept to a person who is planning for the delivery of, or delivering, health services, social services or other support services to that student.
- ii. Subject to any other legal authority or requirement that authorizes or requires disclosure, any person, who receives information from a student record pursuant to section (i) above, must not disclose that information to any other person except for the purposes of delivering or planning the delivery of the services referred in section (i) above.

Confidentiality

In addition to parents/legal guardians and students, access to student records will only be granted, upon assurance of confidentiality (with consent), to professionals who are planning for or delivering education, health, social or other support services to the student concerned. Consent will be obtained in writing, listing the name and date of birth of the student, the name and signature of the parent/ legal guardian and the date of request.

Process to Update and Store a Student Record and Student File

The principal of the Academy or his or her delegate will ensure the following protocols are followed when updating and storing a Student Record:

- Form 1704: update as the information changes on this form including the student's progress through the system
- Active/ Inactive Students: a paper file is to be kept of the Student Record and stored in a fireproof locked cabinet for active student records. For inactive students, this file be stored securely and be preserved from calamity (fire, flood, etc.).
- Access shall be limited to those employees (such as designated records clerks, administration, teachers and counsellors) who, by the very nature of their role at the Academy, are to have access. A paper copy is required currently by the Ministry of Education. Should the Academy wish to store this electronically, protocols and precautions need to be in place for deprecated or obsolete forms of storage. Should such data be accessible via the Internet an encrypted means of access is required.
- Required inclusions must be listed on Form 1704 indicating the date of inclusion and date of expiration.

The principal of the Academy or his or her delegate will ensure the following protocols are followed when updating a student file:



- Student files are locked in cabinets at the school.
- Access shall be limited to those employees (such as designated records clerks, administration, teachers and counsellors) who, by the very nature of their role at the Academy are to have access.
- The Academy, under section 34 of PIPA, is required to protect personal information from unauthorized access, collection, use, disclosure, copying, modification, disposal, or similar risks.
- The principal or his or her delegate will regularly review the student file to ensure that the information contained remains relevant and important to the education program for the student. It is the principal who is responsible for determining the relevancy of the contents of a student file.
- Archiving and Storage: the Academy will ensure that the student file is retained for no less than 55 years from the date of graduation or withdrawal from the school. It shall be securely stored and preserved from calamity.

Process to Transfer Student Records

Within British Columbia: upon receipt from the requesting school authority where the student is or will be enrolled, the Academy shall forward the Student Record (including the required inclusions), the current IEP (if applicable) for the student concerned. The Academy will retain a copy of the Student Record indicating where the original Student Record has been sent and the date of the record was transferred. Only the Student Record and required inclusions will be transferred to the requesting school authority.

Outside British Columbia: upon receipt from the requesting school authority and receipt of a signed and dated parental consent, a photocopy of the Student Record will be sent including the required inclusions and copy of the most recent IEP (if applicable).

The Academy will only transfer sensitive and confidential information (eg, psychiatric assessments) after receiving from the parents or legal guardian a signed and dated parental consent.

The Academy will not transfer a record of Section 14 *Child, Family and Community Service Act* report of alleged sexual abuse made to a child protection social worker.

A summary of the student's school progress report may be provided to a prospective employer provided a written request is received from the former student. The Academy reserves the right to levy a fee for this service.

Graduating students from the Academy will be provided with an interim and/or final transcript of grades 10, 11 and 12 courses and marks when graduating and upon receiving a future request from the former student. Copies will be mailed directly to institutions of higher learning.

Student files will be reviewed by the principal when a student transfers schools. The principal will ensure that the documents listed on the List of Inclusions are still relevant to the educational program or well-being of the student. Documents that are no longer relevant will be removed from the List of Inclusions and removed from the student file and destroyed in a confidential manner (ie, shredded).

C7). Personal Information Privacy Policy



The School's Commitment to You

Safeguarding your confidentiality and protecting your personal information is a fundamental concern of St. John Paul II Academy. The school is committed to meeting or exceeding the privacy standards established by the BC ***Personal Information Protection Act (PIPA)***

This personal information privacy policy is intended to explain to you the current legislation which is designed to protect your privacy, to regulate the use and collection of information, and to state the steps the school has taken to ensure your personal and financial information is handled appropriately and securely.

Privacy Protection in British Columbia

The Act requires an organization to obtain informed consent from an individual before collecting personal information about that individual, with certain exemptions. The organization must state why it is collecting the information, and how it will use the information collected. The Act also requires the organization to keep the information it has collected in a secure and safe manner, protecting the individual's right to have his or her information protected. The Act also describes with whom the personal information may be shared.

Note: St. John Paul II Academy does not fall under the ***Freedom of Information and Protection of Privacy Act (FOIPPA)***, which applies only to provincial government and its bodies; neither does it fall under the ***Protection of Personal Information and Electronic Documents Act (PIPEDA)***, a federal statute.

Ten Privacy Principles

As part of St. John Paul II Academy's commitment, the following *Ten Privacy Principles* govern the actions of the school as they relate to the use of personal information. These principles have been built upon the values set by the Canadian Standards Association's *Model Code for the Protection of Personal Information* and British Columbia's ***Personal Information Protection Act (PIPA)***.

Principle 1 – Accountability

St. John Paul II Academy is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school designates an individual(s) who is (are) accountable for the school's compliance with the *Ten Privacy Principles*. **Andrea Prout-Bernett, Principal**, is the *Privacy Officer* of the school.

Principle 2 – Identifying Purposes

St. John Paul II Academy will identify the purposes for which personal information is collected before or at the time the information is collected.



Principle 3 – Consent

St. John Paul II Academy will obtain consent of the individual for the collection, use or disclosure of personal information except where the law states exemptions, grants permission, or creates a requirement for collection, use, or disclosure of personal information.

Principle 4 – Limiting Collection

St. John Paul II Academy will limit the personal information collected to those details necessary for the purposes identified by the school.

Principle 5 – Use, Disclosure and Retention

St. John Paul II Academy will only use, disclose and retain personal information for the purpose for which it was collected unless the individual has otherwise consented, or when its use, disclosure or retention is required or permitted by law. Personal information will only be retained for the period of time required to fulfill the purpose for which it was collected.

Principle 6 – Accuracy

St. John Paul II Academy will maintain personal information in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

Principle 7 – Safeguarding Personal Information

St. John Paul II Academy will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

Principle 8 – Openness

St. John Paul II Academy will make information available to individuals concerning the policies and practices that apply to the management of their information.

Principle 9 – Individual Access

St. John Paul II Academy will inform an individual, upon the individual's request, of the existence, use and disclosure of the individual's information, and shall give the individual access to it in accordance with the law. Individuals may verify the accuracy and completeness of their information and may request that it be amended, if appropriate.

Principle 10 – Complaint Process



Individuals may direct any questions or enquiries with respect to the school's privacy policies or practices to the Privacy Officer of St. John Paul II Academy.

What Information Is Collected?

St. John Paul II Academy gathers and uses personal information to provide your child with the best possible educational services enunciated by the mission statement of the school. Most of the information the school collects comes to the school directly from you, and only with your consent. When you apply to register your child, the school will ask you to provide the information that enables it to complete the registration process. This also includes information on academic, health, and personal matters needed by the school to provide the best possible education and co-curricular programs.

How Is Information Used?

St. John Paul II Academy uses

- personal information to communicate with you, process applications and ultimately to provide you and your child with the educational services and co-curricular programs you expect.
- personal information to enable the school to operate its administrative function, including payment of school fees and maintenance of non-educational school programs including parent and volunteer participation and fundraising.
- anonymous/personal information to constantly improve our school, e.g., surveys.
- health, psychological, or legal information to provide certain specialized services in those areas or as adjunct information in delivering educational services.

If for any reason personal information is required to fulfill a different purpose, the school will notify you and ask you for your consent before the school proceeds.

When May Information Be Disclosed?

St. John Paul II Academy keeps personal information strictly confidential and treats it with care and respect. However, some of an individual's personal information may be shared with others as noted below.

When Authorized by You

- Other educational institutions routinely contact the school for personal information about students. For example, if your child moves to another school, student records are requested by the enrolling institution. Your permission to pass on these records is usually obtained when you register your child and authorize the school to disclose such information to other appropriate educational institutions for the ongoing education of your child.
- Contact information may be used to enable the school to provide the para-educational and administrative services usually operated by the school. These services include phoning committees, participation groups, parent evenings and events, annual general meetings, etc.



In some cases, when communication is over the telephone, your consent to the use and/or disclosure of your information will be obtained verbally. In other cases, such as when you communicate through e-mail, your consent will be obtained electronically.

When Required by Law

The type of information the school is legally required to disclose most often relates to family court issues, legal proceedings, court orders and government tax reporting requirements. Student information as per Form 1701 is annually filed with the Ministry of Education.

Only the information specifically requested is disclosed and the school takes precautions to satisfy itself that the authorities making the request have legitimate grounds to do so.

When Permitted by Law

The school is legally permitted to disclose some personal information in situations such as an investigation of illegal activities, reasonable methods to collect overdue accounts, a medical emergency or suspicion of illegal activities etc. Only pertinent information is disclosed. The school does not sell, lease or trade information about you to other parties.

The School's Employees

In the course of daily operations, access to personal information is restricted to authorized employees who have a legitimate reason for accessing it. For example, teachers will have access to personal information about your child but not your account with the school.

All employees of St. John Paul II Academy are required to abide by the privacy standards governed under PIPA. They are also required to work within the principles of ethical behavior as set out in employment contracts and must follow all applicable laws and regulations. Employees are well informed about the importance of privacy and they are required to sign either a code of conduct or a confidentiality agreement that prohibits the disclosure of any personal information to unauthorized individuals or parties. To reinforce their understanding and commitment to upholding client privacy and confidentiality, employees periodically receive up-to-date literature about our privacy policy, principles and standards.

Outside Service Suppliers

At St. John Paul II Academy, the school sometimes contacts outside organizations to perform specialized services such as printing, student assessments, market research or data processing. Suppliers of specialized services are given only the information necessary to perform those services.

Restricting Sharing Information

If you choose to limit the sharing of your personal information, please contact the school office and submit a written letter specifying which items of personal information you wish to limit, and to whom you wish these items to be restricted. Please remember that certain agencies, by law, have access to certain types of personal information.



How Does the School Safeguard Information?

St. John Paul II Academy maintains current security standards to ensure that your personal and financial information is protected against unauthorized access, disclosure, inappropriate alteration or misuse.

Student Files

Student files are stored in secured filing cabinets. Access is restricted to only those employees (teachers, educational assistants, secretaries, etc.) who, by nature of their work, are required to see them.

Electronic Security

The school manages electronic files appropriately with passwords and security measures that limit access by unauthorized personnel. The school's security practices are reviewed periodically to ensure that the privacy of your information is not compromised.

Record Management

Personal information is destroyed one year after the school no longer needs the information or one year after legal minimum retention requirements have been met.

Accessing and Amending Information

St. John Paul II Academy makes decisions based on the information it has. The school makes every effort to ensure information is accurate and complete.

Accessing Your Information

You may access and verify any of your personal information with appropriate notice so that the office is able to supply you with the information you require. Most of this information is available in the registration forms and other forms that you filled out.

Accessing Student Information

You may access and verify school records of your children, with appropriate notice, during normal school hours. In situations of family breakdown, the school will grant access to records of children as determined by judicial review.

Amending Your Information

To help the school keep your personal information up-to-date, the school encourages you to request the school to amend inaccuracies and make corrections. Where appropriate, the school will communicate these changes to other parties who may have unintentionally received incorrect information from the school.

Questions, Concerns and Complaints

The school may add, modify or remove portions of this policy when it is considered appropriate to do so. You may ask for the most recent update of this policy at the school office. Questions, concerns, and complaints about privacy, confidentiality and information handling of the school may be addressed to



the school's Privacy Officer by calling the school office. If necessary, you will be referred to use the school's complaint procedure and appeals policies.

C8). Cash Payment Policy

Effective Date: September 1, 2024

Purpose of this Policy

The purpose of this policy is to mitigate the risks associated with accepting cash as payment for tuition and other related fees, goods, and services, and to align with anti-money laundering requirements under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*.

The School is committed to detecting and preventing any money laundering activities and to ensuring that it does not become involved in any arrangements involving criminal or terrorist property.

In order to fulfil this commitment, the School has established procedures for assessing the risk of financial crime, for internal reporting of suspicious activities and for making suspicious transaction reports to the relevant agencies if necessary.

Scope of this Policy

This Policy applies to all employees of St. John Paul II Academy(the "School").

The Policy

The School will ensure that adequate cash handling and record keeping practices are followed. Where risk factors are identified, the School will ensure that the identities of parents, guardians or other persons making any substantial cash payment to the School are satisfactorily verified.

Procedures

The School will accept the following payment types for tuition payments, deposits, and fees:

- cheque
- pre-authorized debit
- credit card (a percentage surcharge may be charged to offset bank fees)
- money order or bank draft
- cash (up to a maximum amount of \$2,000.00).

The School will accept payment from the following financial institutions:



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- The Bank of Montreal (BMO)
 - Canadian Imperial Bank of Commerce (CIBC)
 - The Bank of Nova Scotia (Scotiabank)
 - Royal Bank of Canada (RBC)
 - TD Canada Trust (TD)
 - All cooperative credit societies, savings and credit unions incorporated under the British Columbia *Credit Union Incorporation Act*
 - All banks incorporated, formed, or authorized under the *Bank Act* of Canada.

Receiving Cash Payments

The School will not accept cash payments in excess of \$2,000.00 in a single transaction¹ for any purpose. All parents and guardians should be encouraged to pay tuition, deposits, and supplemental fees through an alternative payment method such as PreAuthorized Debit.

If any employee is offered funds that he or she knows or suspects are criminal property or may represent terrorist finance, or if he or she receives any unusual request to receive or transfer money, it will be reported immediately, in accordance with the Reporting section of this Policy, to the Principal or Chairman of the Society Board (the “Reporting Officer”) who will, if appropriate, contact the Financial Transactions and Reports Analysis Centre of Canada (“FINTRAC”), police or other relevant agency.

Refund procedures

Refunds will be issued only in accordance with the School’s refund policy.

Cash payments will be refunded by cheque made payable to the parent or guardian of the student. All other refunds will be made to the original form of payment unless otherwise approved by the Principal.

All requests for a refund in cash following a payment by credit card, wire transfer, cheque, etc., will be reported to the Reporting Officer.

Suspicious Transactions

Employees will evaluate the source of funds that are paid to the School and be alert to unusual patterns of behaviour or activities that may indicate the possibility of money laundering or other terrorist financial crimes. It is not possible to produce an exhaustive list of the matters that might give rise to a suspicion of money laundering or other terrorist financial crime. It is therefore important that employees use their own judgment when looking at any business relationship or transaction. Facts, context and money laundering/terrorist financing indicators need to be assessed to determine whether there are reasonable grounds to suspect that the transaction is related to the commission or attempted commission of a money laundering/terrorist financing offence.

The following are some possible money laundering/terrorist financing indicators:

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- Transactions: The parent, guardian or payer engages in multiple transactions conducted below the reporting threshold within a short time period, makes inquiries that would indicate a desire to avoid reporting, or exhibits knowledge of reporting thresholds.
 - Structures: Payments involving complex or illogical arrangements that make it unclear who is making the payment or appear to be structured to avoid identification or reporting thresholds.
 - Third parties: Payment of school fees or involvement by companies, trusts, off-shore entities or other third parties with no obvious relationship to student. The parent, guardian or payer appears to be collaborating with others to avoid client identification or reporting thresholds.
 - Assets: There are reasons to doubt the ability of a person to have a legitimate source for the funds.
 - Identity: The parent, guardian or payer has taken steps to hide their identity or is difficult to identify. The parent, guardian or payer uses a post office box or general delivery address where other options are available. There are doubts about the honesty, integrity, identity or location of the parent, guardian or payer.
 - Behaviour: The parent, guardian or payer seems unusually anxious to complete a transaction, is unable to justify why they need to make a payment quickly, requests a cancellation, reversal or refunds of earlier transaction or makes an overpayment for no good reason.
 - Documents: Information or documentation is withheld by the parent, guardian or their representative or appears falsified. Cash payments are made using old, smelly or extremely dirty bills.

Reporting

Employees of the School will make a report to the Reporting Officer, as soon as reasonably possible, where they have knowledge or suspicion, or where there are reasonable grounds for having knowledge or suspicion, that another person is engaged in money laundering, or that terrorist property exists ("Suspicious Transaction Report").

Your report should include as much detail as possible including:

- Full available details of the people, and organizations involved including yourself and other members of staff if relevant.
- Full details of transaction and nature of each person's involvement in the transaction.
- Suspected type of money laundering activity or use of proceeds of crime with reasons for your suspicion.
- The dates of any transactions, where they were undertaken, how they were undertaken, and the likely amount of money or assets involved.



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- Information on any investigation undertaken to date, including whether the suspicions have been discussed with anyone and if so on what basis.
 - Whether any aspect of the transaction(s) is outstanding and requires action to progress.
 - Any other information that may help the Reporting Officer judge the case for knowledge or suspicion of money laundering and to facilitate any external report.

Once you have reported your suspicions to the Reporting Officer, you will follow any instructions provided. You will not make any further enquiries unless instructed to do so by the Reporting Officer. Any further transactions or activity in respect of the person in question, whether or not it is related to the matter that gave rise to the original suspicion, should be reported to the Reporting Officer as they happen, unless and until the Reporting Officer has confirmed that no report to the FINTRAC is to be made.

The Reporting Officer will consider all Suspicious Transaction Reports and will make an external report to the FINTRAC (who will undertake any necessary investigation) as soon as is practicable if he/she considers that there is knowledge, suspicion or reasonable grounds for knowledge or suspicion, that another person is engaged in money laundering, or that terrorist property exists, even if no transaction takes place ("FINTRAC Report"). All FINTRAC Reports will comply with FINTRAC reporting requirements.

Record Keeping Practices

All Suspicious Transaction Reports will be documented, either on paper or electronically. All enquiries that are made within the School in relation to any Suspicious Transaction Report should also be recorded. The School will keep details of actions taken in respect of Suspicious Transaction Reports, including details of information considered by the Reporting Officer in respect of a Suspicious Transaction Report where no external FINTRAC report is made. The School will also keep a copy of any FINTRAC Reports and associated evidence and documentation.

The School will retain copies of the information the employee obtained regarding the identification and verification of individuals from whom it received cash payments in excess of \$3,000.00, together with details of all transactions including relevant dates.

All information, evidence and reports with respect to Suspicious Transaction Reports, FINTRAC Reports, and identification and verification of individuals will be kept by the School for a minimum of five years.

Cash Handling

The School will establish responsibility and describe the minimum requirements for cash handling.

The following procedures will be followed by employees when handling cash:



- Cash will be stored in a locked and secure location until the funds are deposited.
- Cash should be deposited on a daily basis. Where this is not possible and providing amounts are minimal, funds will not be held for longer than one week.
- Collection of cash, deposit preparation, and reconciliation duties will be performed by separate individuals to the extent possible, to ensure the safeguarding of cash. At minimum, deposit preparation and reconciliations are to be completed by separate individuals.
- Cash receipts will be reviewed and reconciled to ledger accounts on a timely basis to ensure they have been correctly recorded. Accounting adjustments to ledgers will also be made on a timely basis.
- Cash shortages or other discrepancies should be reported immediately to Review

This Policy will be reviewed and updated as needed, but at least annually.

¹ For the purposes of this Policy, a single transaction includes multiple payments within a 24-hour period.

<i>Document History</i>	<i>Approved</i> Society Board 20 October 2020
<i>Revisions</i>	Updated 20 December 2022
	<i>Approved</i> Society Board 21 October 2024