



CoverED Privacy Policy 20260818

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Introduction

OpenArk Systems ("OpenArk", "we", "us") provides CoverED, a system that books substitutes for school staff who need to be away. This policy explains what personal information CoverED collects, how we use it, who we share it with, and the choices you have.

OpenArk Systems is a British Columbia company. We handle personal information in accordance with the *Personal Information Protection Act* (BC) (PIPA), the *Personal Information Protection and Electronic Documents Act* (PIPEDA) where it applies, and the privacy legislation that governs our customers.

Which law governs your information depends on your school:

- **BC public school districts** are public bodies under the *Freedom of Information and Protection of Privacy Act* (FIPPA). The district remains responsible for its employees' information under FIPPA, and we act as its service provider. We support districts in completing the Privacy Impact Assessment that FIPPA s.69 requires before a new system is deployed, and in meeting their FIPPA obligations on access requests and privacy breaches.
- **Independent schools and other private organizations** are governed by BC PIPA or by the private-sector privacy law of their province.

Where this policy refers to a right or a timeline, we apply whichever of these laws gives you the stronger protection.

If you use CoverED, please read this policy. If you are a school considering CoverED, this policy tells you what happens to your people's information.

Who We Are

OpenArk Systems builds and operates CoverED. Our customers are schools and school districts.

The relationship works like this:

- **The school or district decides** why staff information is collected and how it is used. It is the organization accountable for that information under the privacy law that applies to it.
- **OpenArk Systems is the service provider.** For everything CoverED does to book substitutes, contact people about work, track absences and keep school records, we hold and process information on the school's behalf, under the school's instructions and under this policy. We do not use that information for any purpose of our own.
- **Where we act for ourselves.** We separately use limited technical and usage data to keep CoverED secure, diagnose faults and improve the product. For those purposes OpenArk Systems is the accountable organization, and we describe them, and your choices about them, under Cookies and Analytics.

If you are a staff member, substitute, or administrator using CoverED, your school or district is your first point of contact for questions about why your information is in the system. We are happy to help with anything about how CoverED itself handles it.

Accounts are created for you. There is no self-signup. An administrator at your school creates your account, and CoverED emails you a link to set your password and confirm your details.

Personal Information We Collect

Everything below relates to working adults.

Account and Profile Information

- Name
- Email address
- Phone number
- Profile picture, if you upload one
- Your roles: staff, sub, or admin
- Which booking groups you belong to
- Whether your account is active, and when you finished onboarding

Your name, email address and phone number are visible to everyone in your booking group. Phone numbers are shown deliberately so that people can reach a substitute directly.

Authentication Information

- A hashed version of your password. We never store your password itself, and nobody, including administrators, can view it.
- Hashed session and reset tokens, with their expiry and redemption times
- The date your password was last changed

Password reset and password change emails include the IP address and browser user agent of the request that triggered them, so you can spot a request you did not make.

Employment and Scheduling Information

- Your roles and which schools or booking groups you work at
- For substitutes: your booking profile, meaning the grades and subjects you can cover, and whether you are currently taking work
- Callouts: who is away, when, the grades and subjects involved, and who covered
- Offers: which substitutes were contacted for a callout, in what order, and how each one answered
- Hours worked and full-day or half-day splits for substitutes

A note on "grades". In CoverED, a grade means a grade level taught, such as grade 9 or grade 11. It is a way of matching a substitute to an assignment. CoverED holds no student marks, report cards, or academic records of any kind.

Absence and Leave Information

- The absence reason attached to a callout
- Days used against each leave bank, and the running balance
- The leave ledger: each entry, the days it applied, when it was recorded, and who recorded it

This category needs care. Absence reasons are named by your school's administrators and in practice include categories such as Medical, Sick Leave, Care Leave and Appointment. Linked to a named person, that is health-adjacent information. We treat it accordingly:

- A substitute never sees the absence reason on a callout they cover, unless that same person also holds the staff or admin role in CoverED. The field is withheld from anyone who holds neither role.
- Absence reasons and payroll notes are restricted in the change history and in exports to roles that hold the sensitive-field permission.
- Staff see only their own leave usage. Administrators see usage across their booking group.

Availability Information

- Unavailability entries: the period you cannot be booked, any repeat rule, and a required title plus an optional description
- The calendar projection built from those entries

Titles and descriptions are free text you write yourself. Upcoming unavailabilities, including their titles, are visible to everyone in your booking group and appear when someone is looking for a substitute. Please keep them brief and non-medical: "unavailable" or "other commitment" is enough.

Free-Text Information You Write

CoverED has several free-text fields, and their contents are entirely up to the person typing:

- **Staff Notes** on a callout: instructions for the substitute, read by the substitute and administrators
- **Comments** on a callout: a thread between the staff member, the substitute and administrators. A comment cannot be edited or removed by users once posted.
- **Substitute Feedback**: what the substitute writes after the callout
- **Payroll notes**: notes on a callout, visible to and editable by administrators and staff. Substitutes never see them.
- **Leave ledger reasons**
- **Unavailability titles and descriptions**
- **Support messages** you send to the CoverED team

Please see Children's Privacy below for what should not go into these fields.

Communications Information

- Your notification preferences for email, text message and phone call
- A record of every notification sent to you: the type, when it was sent, whether you read it, and the details used to build the message, such as the names and school name it mentions
- Phone numbers, email addresses and rendered message text held in our background job queue while a message is being sent

CoverED does not record or transcribe phone calls.

Technical Information

- The IP address and browser user agent attached to a support message you submit
- Server logs, which include request IP addresses and, on notification delivery, recipient email addresses and phone numbers

- Timestamps on records, and an audit history of changes to user records and callouts
- Analytics and error-reporting data from the CoverED web app, described under Cookies and Analytics

Change History

CoverED keeps an audit history of every change to a user record and to a callout: what changed, who changed it, when, and the previous value. This includes previous values of names, email addresses, phone numbers and free-text fields. Nobody can edit it, and it survives the deletion of an account. We retain it for the period set out under Data Retention.

How We Use Your Information

We use personal information for the following purposes, and nothing else:

- **To book substitutes.** Matching a callout to substitutes who fit it, sending offers in order, and recording who accepted.
- **To contact people about work.** Emails, text messages and phone calls about offers, bookings, drop-outs, cancellations and unsuccessful searches. A phone call is only ever made to offer you a callout.
- **To track absences and leave.** Recording absence reasons and leave usage so schools can manage entitlements.
- **To let people coordinate.** Showing contact details, notes, comments and feedback to the people on a callout.
- **To give administrators oversight.** Dashboards, reporting, CSV exports and analytics within their booking group.
- **To keep records.** An audit history of changes to users and callouts.
- **To secure accounts.** Authentication, session management, password resets and rate limiting.
- **To support and improve the product.** Responding to your support messages, diagnosing errors, and understanding how the app is used. This is our own purpose rather than the school's, as described under Who We Are.

We do not sell personal information. We do not use it for advertising. No personal information in CoverED is processed by an AI or language model service.

Cookies and Analytics

Cookies. CoverED sets one essential cookie, `access_token`, which keeps you logged in. It is set HttpOnly, Secure and SameSite=Strict. It is required for the service to work and cannot be turned off. The app also stores a session refresh token in your browser's local storage.

Analytics and monitoring. The CoverED web app uses:

- **Mixpanel** for product analytics, including session replay. Mixpanel receives your user ID, name, email address, roles and group IDs, and records what is displayed on screen during your session. Text is masked in those recordings, so the words you write into notes, comments, feedback and other fields are not captured. What is recorded is the shape of the page, the images displayed on it, and how you move through the app. Mixpanel processes this data in the United States.
- **Sentry** for error reporting. Sentry receives your user ID, email address and name along with error details, request headers and IP address. Sentry processes this data in the United States.
- **GoatCounter** for page view counts. This is self-hosted by OpenArk and receives only the page path and referrer.

Your choices about analytics and session replay. You can opt out of product analytics and session replay at any time by contacting your administrator or our Privacy Officer, and opting out does not affect your use of CoverED. A school can also ask us to turn both off for its whole booking group. Error reporting, which we treat as necessary to operate the service securely, continues regardless.

Consent

Your school or district collects your information as part of your employment or engagement, and is the organization responsible for the basis on which it does so. In most cases that collection is for purposes related to your work and does not require separate consent.

Where consent is required, you give it by:

- Completing onboarding and using CoverED
- Choosing to add a phone number, which enables text messages and phone calls
- Choosing to upload a profile picture
- Writing free text into notes, comments, feedback or unavailability entries

Withdrawing consent. You can turn off any notification channel at any time in your profile, and remove your phone number to stop texts and calls. You can remove your profile picture. You cannot withdraw consent for the information CoverED needs to book substitutes and keep employment records without ending your use of the service. Speak to your administrator about that.

Disclosure of Personal Information

Within Your Booking Group

- Everyone in your booking group can see your name, roles, email address and phone number.
- Substitutes' upcoming unavailabilities are visible to everyone in the group.
- The staff member, the assigned substitute and administrators see the callout, its Staff Notes, Comments and Substitute Feedback.
- Administrators see every callout, offer, leave balance and user record in the booking groups they run, and can export them to CSV.
- A substitute never sees the absence reason, unless that person also holds a staff or admin role in CoverED.

Service Providers

We use a small number of providers to deliver the service. Each receives only what it needs, each is bound by a written agreement that limits it to processing on our instructions and requires protection comparable to that described in this policy, and we remain accountable to the school for information in their hands. We maintain a current list of these providers and will give schools at least 30 days'

notice before adding a new one that handles personal information, so that the school can update its own assessments or object.

- **Twilio** delivers our text messages and places our outbound phone calls, both from the same number. For a call, Twilio receives the substitute's phone number and, through the script our system supplies, the substitute's name, the absent staff member's name, the school name, and the date and time of the callout, which its text-to-speech engine reads aloud. Twilio returns the keypress response, a call identifier, and whether the call was answered by a person or a machine. **Calls are not recorded and not transcribed.** For a text message, Twilio receives the recipient's phone number and the full message text, which includes names, callout times, school names and accept or decline links. Message contents never include the text of a comment, only the fact that a comment was left. Twilio processes this data in the United States.
- **Amazon Web Services** hosts our infrastructure in the Canada (Central) region, and provides our email delivery. AWS receives recipient email addresses and full message contents, which include names, callout times, school names, accept or decline links, and, in leave balance emails, the absence reason name together with the days used and remaining in that leave bank. Message contents never include the text of a comment, only the fact that a comment was left.
- **Amazon CloudFront** caches and serves the web application and profile pictures from edge locations across North America, Europe and Israel.
- **Mixpanel** and **Sentry**, as described under Cookies and Analytics. Both process data in the United States.
- **Grafana Cloud** for infrastructure monitoring and log collection, in its Canada region. Application logs can contain email addresses, phone numbers and IP addresses.

Our email templates reference a webfont hosted by Google. If your email client loads it, Google may receive your IP address and user agent. Most email clients block this.

We do not use a payment processor, a third-party sign-in provider, or any AI or language model service.

Legal Requirements

We may disclose personal information where required by law, including:

- To comply with a subpoena, court order, warrant or other lawful demand
- To a government or regulatory body exercising a lawful authority
- To investigate a suspected breach of an agreement, fraud, or a threat to someone's safety
- To our professional advisors where necessary and under a duty of confidence

We will tell the affected school where we are permitted to do so.

Business Transfers

If OpenArk Systems is involved in a merger, acquisition or sale of assets, personal information may transfer as part of that transaction. It would remain subject to this policy or a policy at least as protective, and affected schools would be notified.

Data Storage and Security

Location

Our core infrastructure runs in Canada. Databases, backups, file storage and email delivery are all hosted in the AWS Canada (Central) region in Montreal, on infrastructure operated by OpenArk Systems. Our infrastructure monitoring and log collection run in Grafana Cloud's Canada region.

Some data is processed outside Canada, and you should know exactly what:

- **Twilio (United States).** Phone numbers, the spoken content of offer calls, which names the substitute, the staff member, the school, and the callout time, and the full text of every text message we send, which includes those same details and accept or decline links.
- **Mixpanel (United States).** Product analytics, user profile details, and session recordings of the web app.
- **Sentry (United States).** Error reports including user ID, email address, name and IP address.

- **Amazon CloudFront edge locations (North America, Europe, Israel).** Cached web application files and profile pictures.

Personal information stored outside Canada is subject to the laws of the country it is stored in, and may be accessible to the courts and law enforcement of that country. Schools that need a stricter residency arrangement should contact us before deploying CoverED.

Security Measures

- **Encryption in transit.** All connections to the application and API are over HTTPS, with a TLS 1.2 minimum on the web application and static assets.
- **Encryption at rest.** Database volumes and storage buckets are encrypted using AES-256.
- **Password protection.** Passwords are hashed with bcrypt. Nobody, including OpenArk staff and school administrators, can view a user's password.
- **Session security.** The login cookie is HttpOnly, Secure and SameSite=Strict. Access tokens expire after 60 minutes and sessions after 30 days. Setup links last 7 days and password reset links last 1 hour.
- **Rate limiting** on login, password reset and account setup endpoints.
- **Role-based access control.** Application pages and records are gated by role, and users see only the booking groups they belong to, plus any booking groups nested beneath those. A district-level administrator sees the schools within that district. Sensitive fields, including absence reasons and payroll notes, carry an additional permission requirement. Two things sit outside this gate by design: profile pictures, which are served from our content delivery network at an unguessable address and can be retrieved by anyone holding that address without logging in; and the accept and decline links described below.
- **Audit history.** Changes to user records and callouts are recorded with the actor and timestamp.
- **Encrypted, versioned backups** held in Canada.

CoverED does not currently support multi-factor authentication or single sign-on.

Accept and decline links sent by text message and by email contain a short code that works without logging in, so that a substitute can respond quickly. These codes expire after 7 days. Please do not forward them.

We cannot guarantee absolute security, but we work to protect your information using the measures above.

Data Retention

We keep personal information for as long as the school needs it and as long as the law requires.

- **Absence, callout, offer and leave records** are retained for the period the school specifies in its agreement with us, and in the absence of a specified period for seven years from the end of the school year in which the record was created, which reflects common employment and payroll record-keeping requirements. Deletion at the end of that period is carried out by us on request rather than automatically.
- **Comments, Staff Notes and Substitute Feedback** are retained on the same schedule as the callout they belong to.
- **Change history** is retained for seven years from the date of the change, then deleted on the same basis. It holds previous values of fields, including previous names, email addresses, phone numbers and free-text notes, and it survives the deletion of an account.
- **Comments cannot be edited or deleted by users once posted.** Removing one requires a request to us, as described below.
- **Server logs**, which can contain email addresses, phone numbers and IP addresses, are retained for 31 days.
- **Product analytics and error reports** held by Mixpanel and Sentry are retained under the retention settings configured with each provider.
- **Expired sessions and expired or redeemed password reset and account setup tokens** are purged daily.
- **Expired offer short codes** are purged on a schedule.

- **Background job records**, which hold phone numbers, email addresses and rendered message text while a message is being sent, are pruned automatically 24 hours after the job completes. Where a delivery fails permanently, the record is kept for up to 7 days so that the failure can be diagnosed, then pruned.
- **Backups** are retained for up to 60 days, after which they roll off automatically.

A school may direct us in writing to apply a shorter period, and we will follow that direction.

Deactivating an account disables access but keeps the person's records.

Deleting an account removes the login and profile, but callouts, offers, comments, notifications and change history that reference that person remain.

If you or your school need information removed rather than deactivated, contact our Privacy Officer and we will work through what can be deleted and what must be retained for the school's records.

When a school stops using CoverED. For 30 days after the end of a school's engagement we will, on request, provide a complete export of that school's data in a machine-readable format. After that window we continue to hold the school's data until the school asks us in writing to delete it. Deletion is carried out by us on request rather than automatically. Once we act on a deletion request we remove the school's personal information from our live systems, it rolls out of our backups on the schedule described above, and we confirm the deletion in writing.

Your Rights

Under the privacy law that applies to you, you have the right to:

- **Access** the personal information we hold about you
- **Correct** information that is inaccurate or incomplete
- **Withdraw consent** where consent is the basis for a use, subject to legal and contractual limits
- **Ask questions** about how your information is handled
- **Complain** about our handling of your information

What you can do yourself, in the app:

- Edit your name, email address, phone number and profile picture
- Change or turn off your notification preferences
- View your own change history, leave usage and callouts
- Export your callouts to CSV
- Add, edit and remove your own unavailability entries

What to ask for. Your roles are set by an administrator and only an administrator can change them. For a full copy of your information, a correction you cannot make yourself, or a deletion request, contact your school administrator or our Privacy Officer.

Because your school or district is the organization accountable for your information, we normally forward an access request to it and support it in responding. Where we respond directly, we will first take reasonable steps to verify your identity.

We will respond within 30 days of receiving a request we can act on. If we need more time, we will tell you within that first 30 days, explain why, and give you our new deadline, which will be no more than 30 days later. There is no charge for a reasonable request; if a request would involve a cost, we will tell you the estimated cost and get your agreement before proceeding. If we refuse a request, we will explain why, tell you which provision we rely on, and tell you how to challenge the decision.

Data Breach Notification

If personal information in CoverED is lost, accessed without authorization, or disclosed without authorization, and there is a real risk of significant harm, we will:

- Contain and investigate the incident as quickly as we can
- Notify the affected school or district, through its administrators, as soon as feasible, and in any event within 72 hours of confirming the incident, with whatever facts we have at that point, followed by updates as the investigation progresses

- Report to the Office of the Privacy Commissioner of Canada where PIPEDA requires it, and to the Office of the Information and Privacy Commissioner for British Columbia where BC PIPA requires it
- Give the school the information it needs to meet its own breach obligations, including notification to the BC OIPC and to affected individuals under FIPPA s.36.3 where the school is a BC public body, and support it in notifying affected individuals
- Notify individuals directly where the school asks us to or where it is otherwise appropriate
- Keep a record of every breach of security safeguards for at least 24 months, as PIPEDA requires, and make those records available to a regulator on request

Our notification will describe what happened, what information was involved, what we are doing about it, and what affected people can do to protect themselves.

Third-Party Links

Free-text fields in CoverED, including Staff Notes and Comments, may contain links to other websites. Those sites are outside our control and are not covered by this policy. We are not responsible for their content or their privacy practices. Please review the privacy policy of any site you visit from a CoverED link.

Children's Privacy

CoverED is not a student information system. It does not collect, request, or process information about students or children as part of its normal operation.

CoverED is a staffing system about adult employees and substitutes. There is no student record, no class roster, no enrolment data, no attendance data and no student identifier anywhere in the system. Where CoverED uses the word "grade", it means a grade level a substitute can cover, such as grade 9. It never means a student's mark.

There is exactly one way information about a child can enter CoverED: **if a staff member types it into a free-text field**. Those fields are Staff Notes, Comments,

Substitute Feedback, payroll notes, leave ledger reasons, unavailability titles and descriptions, and support messages.

Instruction to our clients and their staff:

- **Do not enter student or child information into any free-text field in CoverED.**
No names, no initials, no medical or behavioural details, no accommodation or support plan details, nothing that identifies a particular child.
- Write instructions for a substitute in a way that does not name or identify a student. Refer to seating plans, folders or binders held in the classroom instead.
- If sensitive information about a student must be passed to a substitute, pass it through your school's own student information system or in person, not through CoverED.

Remember that comments cannot be edited or deleted by users once posted, and that change history retains previous versions of free-text fields. Information entered into a free-text field is difficult to remove.

If you believe a child's information has been entered into CoverED, contact our Privacy Officer and we will work with your school to have it removed.

CoverED accounts are created for employees and substitutes by an administrator. The service is not directed at children. CoverED accounts are created by school administrators for people employed or engaged by the school, and we rely on the school to create accounts only for people eligible to work for it.

Changes to This Privacy Policy

We may update this policy as CoverED changes or as the law changes. When we do:

- We will update the "Last Updated" date at the top
- We will post the revised policy
- For a significant change, we will notify the schools and districts using CoverED before it takes effect

A change to this policy does not, by itself, authorize us to use information we already hold for a new purpose. If we want to use your information for a purpose not described here, we will obtain the necessary consent, through your school where the school is the accountable organization, before we do.

Contact Us

For any question about this policy or about your personal information, contact our Privacy Officer:

Isaac Thiessen, Privacy Officer

OpenArk Systems

2-1181 Cherry Road

Victoria, British Columbia, V8Z 7G3

Canada

isaac@openark.net

If you are a staff member, substitute or administrator, please also contact your school or district, since they decide what information CoverED holds about you.

Complaints

If you are not satisfied with how we handled your personal information or your request:

1. **Write to our Privacy Officer** at the address above. Tell us what happened and what you would like us to do. We will acknowledge your complaint and investigate it.
2. **We will respond in writing** with our findings and any steps we are taking.
3. **If you are still not satisfied**, you can complain to the Office of the Information and Privacy Commissioner for British Columbia, which oversees BC PIPA and FIPPA, or to the Office of the Privacy Commissioner of Canada where PIPEDA applies:

Office of the Privacy Commissioner of Canada

30 Victoria Street

Gatineau, Quebec, K1A 1H3

Toll-free: 1-800-282-1376

www.priv.gc.ca

Governing Law

This Privacy Policy is governed by the laws of British Columbia and the federal laws of Canada that apply there. Any dispute about it is subject to the exclusive jurisdiction of the courts of British Columbia.