

POLICY:

The District 69 Family Resource Association, uses and discloses personal information to the extent required to fulfill its responsibilities and operate our Association. Our Association is committed to maintaining the privacy of personal information provided by our employees, clients, volunteers and donors and protecting all personal information in our possession or control.

PURPOSE:

This Privacy Policy sets out the principles and practices that the Association follows in meeting its privacy commitments to our employees, clients, volunteers, practicum students and donors and complying with the federal and provincial legislation concerning the collection, use and disclosure of personal information. Reference the Federal Personal Information Protection and Electronic Documents Act [PIPEDA] and British Columbia Personal Information Protection Act [PIPA].

SCOPE:

This policy covers all personal information collected in the operation of the Association from employees, clients, volunteers, practicum students and donors.

RESPONSIBILITY:

It is the responsibility of Management and/or a designated privacy control officer to monitor the collection, use and disclosure of personal information.

PROCEDURE:

The ten main principles behind the collection, use and disclosure of personal information by the Association include:

1. **Accountability** – The Association is responsible for personal information under its control or possession. This includes any personal information that the firm received directly from employees, clients, volunteers, practicum students and donors. The Association's Privacy Officer is the Executive director or a designate, and can be reached at the Association's office.

2. **Identifying Purposes** – The Association collects personal information from employees, clients, volunteers and donors and discloses such information, only to provide the services during the operation of the Association.

3. **Consent** – We require the knowledge and consent all individuals for the collection, use, or disclosure of personal information, except where inappropriate. Only under certain circumstances, will personal information be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical, or security reasons may make it impossible or impractical to seek consent.

4. **Limiting Collection** – The Association shall limit collection of personal information to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

5. **Limiting Use, Disclosure, and Retention** – The Association shall not use or disclose personal information other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as is necessary for the fulfillment of those purposes.

6. **Accuracy** – Employees, clients, volunteers, practicum students and donors are encouraged to contact the Association to update their personal information as changes occur.

7. **Safeguards** – The Association protects the privacy of personal information by using security safeguards appropriate to the sensitivity of the information.

8. **Openness** – The Association is open about the procedures it uses to manage personal information. Up-to-date information on the association's privacy policy can be obtained from our Privacy Officer –Executive Director- at 250-752-6766 or via email at info@d69fra.org This e-mail address is being protected from spambots. You need JavaScript enabled to view it .

9. **Individual Access** – The Association upon request shall inform an individual of the existence, use and disclosure of his or her personal information and shall be given access to that information. All individuals shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate. In certain situations, the Association may not be able to provide access to all the personal information it holds about an individual, however the reasons for denying access will be provided to the individual upon request. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security, or commercial proprietary reasons, and information that is subject to solicit-client or litigation privilege.

10. **Challenging Compliance** – All individuals shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the Association's compliance to the Privacy Code.

Privacy Policies and Procedures

Collection and Retention of Personal Information

Clients

As a resource, referral and capacity building agency District 69 Family Resource Association collects and uses Personal Information in order to serve its clients. The primary purpose for collecting information is for administrative or services used.

Other purposes for collecting information may include research studies and to market services.

Personal information from conference/training registrations is used for administration and to disseminate information about additional training opportunities offered by District 69 Family Resource Association. Attendees will be given the opportunity of opt out of inclusion on a delegate list distributed to attendees, as well as to have their name removed from training opportunities bulletins.

Client files for service contracts will be retained in accordance with the terms of the contract. On termination of the contract, files will be destroyed, erased or returned to be disposed of as required by the funder and the law.

Where not otherwise defined by contract or required by law, client files will generally be retained for a period of seven years.

Employees The primary purpose for collecting Personal Information is to complete payroll, communicate with employees and maintain the employee relationship. A further purpose is to fulfill the Society's legal requirements with regard to its employees and clients.

Employee files will be kept for seven years after employment ends. Payroll data, which constitutes a part of the permanent financial record of the Society will be kept for the life of the organization.

Only the Executive Director or another manager may provide employment references for former employees, and only upon request by the former employee. References are not provided for former employees after five years have elapsed from the time of their employment.

Resumes, applications and interview notes with respect to candidates who are not hired are kept for 12 months from receipt, after which time they are destroyed.

Contract Employees

The primary purpose for collecting Personal Information for those who provide contract services (e.g. researchers, consultants, facilitators) is for work-related communications and potential contact for future assignments.

In almost all cases, unless required by the terms of the contract, this information is limited to contact information only. Where additional information has been collected, this will be retained in accordance with policies on employee files.

Board Members

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

The secondary purpose for collecting information is to allow the Association to fulfill its legal reporting requirements and contractual agreements.

These purposes include the Society's Return to the Province of BC, Charity Information Return T3010A, banking requirements, insurance carrier for Directors' and Officers' liability insurance, Ministry of Human Resources and other funding bodies.

Personal information about former Board Members, other than that which must be retained to fulfill the Society's legal requirements, will be destroyed after five years.

District 69 Family Resource Association Volunteers and Practicum Students

The primary purpose for collecting Personal Information is to allow for placement, communication and recognition.

Contact information for a family member or friend is also collected in case of an emergency.

After a volunteer or practicum student leaves, Personal Information will be kept for three years.

Donors

Personal Information from donors and potential donors is collected for the purpose of issuing tax receipts, keeping donors updated about events of interest, building relationships with donors and communicating the Society's fund raising needs.

All information regarding a donor will be kept confidential. Donor lists will not be shared with third parties or sold.

Lists of donors or potential donors may be kept indefinitely, except where the donor or potential donor specifically requests that their Personal Information be destroyed.

Photographs

Photographs and images that promote service are used by District 69 Family Resource Association in a variety of media including our web site, brochures, displays, annual reports and other promotional materials.

District 69 Family Resource Association will obtain a Photo Waiver from any individual whose photograph or image will be used in promotional materials.

Photographs will be kept indefinitely unless the individual or one of the individuals in a photograph, requests that their image no longer be used. Upon such a request, the photograph or image will be removed from the promotional media as soon as is reasonable possible.

As photographs form a part of the Association's historic and archival records, photographs will not generally be destroyed when an individual requests that their image be withdrawn from promotional use.

Contractors

Personal Information collected and used by our contractors will meet or exceed the Society's standards and policies.

District 69 Family Resource Association Privacy protection schedule will form part of the agreement between the Society and the Contractor, in cases where the Contractor will be collecting or using personal information.

Security of Personal Information

Appropriate security safeguards are in place to protect Personal Information which is held by the Society.

Computer Data

All staff and District 69 Family Resource Association workstations are password protected. Workstations used by clients/students/volunteers have restricted access to the network.

Sensitive files are also password protected. Access is restricted to only those individuals whose work relates directly to the files.

In addition to passwords for workstation access, sensitive software programs such as the Society's accounting program are also password protected.

Access is restricted to only those staff whose work relates directly to the program.

Electronic equipment is under supervision, secured or in a restricted area at all times.

Paper Files

All filing cabinets, desk drawers and other storage devices for paper files containing Personal Information are under supervision, secured in a restricted area or locked at all times.

Access to sensitive files is restricted to relevant employees who need the information in order to carry out their work.

With regard to employee information, employee files may only be accessed by the Executive Director, Human Resource Manager or other staff that have been designated such access by the Executive Director or Human Resource Manager.

Destruction of Personal Information

When Personal Information is no longer required for the purpose for which it was collected, the information will be destroyed, erased or otherwise made anonymous.

Paper Files

Paper files will be destroyed by shredding. Shredding will be carried out in a secure area and by appropriate personnel.

Electronic Files

Electronic files will be destroyed by deletion. When computer hardware is discarded, the Society will ensure that hard drives are reformatted to erase any information contained on this media.

Privacy Officer

The Executive Director is responsible for the Society's privacy compliance. As the Privacy Officer, the Executive Director's name will be made available to members of the public. The Privacy Officer will ensure that:

- a) Information protection policies are established and updated
- b) Sensitive information is protected and accessibility properly controlled
- c) Employees are educated as to the importance of information protection

- d) Enquiries and requests are addressed expediently and thoroughly
- e) Privacy complaints are resolved efficiently with the goal of satisfying all individuals involved

Complaints Process

The Privacy Officer will be responsible for receiving and responding to any complaints regarding District 69 Family Resource Association's compliance with the Act.

Communication to staff

The procedures for handling complaints will be communicated to all staff upon their employment with District 69 Family Resource Association.

Procedures will be reviewed when any changes are made.

Complaints must be in writing

Complaints regarding District 69 Family Resource Association's compliance with the Act must be received in writing and signed by the complainant.

In cases where this would be prohibitive due to language or other barrier, an initial complaint may be provided verbally.

As it is important to the investigation to have the complaint written up and signed by the complainant as to its accuracy, formal documentation is required prior to conducting an investigation.

Making a Complaint

Upon request, staff will inform an individual of the procedure for making a complaint. This information will include:

- The requirement that complaints be received in writing and signed
- The name of the Privacy Officer to whom the complaint should be addressed
- When and how the Privacy Officer will contact the complainant

Handling the complaint process

When a complaint is received:

- It will be forwarded immediately to the Privacy Officer
- The date that the complaint was received will be recorded
- Receipt of the complaint will be acknowledged promptly and in writing
- The Privacy Officer will respond to all complaints within 30 working days
- All complaints will be investigated in a fair and impartial manner
- The Privacy Officer may contact the complainant to clarify the complaint
- The Privacy Officer will endeavour to achieve a mutually satisfactory resolution
- The complainant will be notified in writing of the outcome of the investigation
- Policies and procedures may be modified based on the outcome of the investigation

Failure to Resolve the Complaint

- In the event that the Privacy Officer is unable to resolve the complaint to the satisfaction of all parties within a reasonable period of time, the complainant will be informed of his/her right to recourse with the Information and Privacy Commissioner. The Office of the Information and Privacy Commissioner can be reached at:

3rd Floor 756 Fort Street, Victoria, BC V8W 9A

Ph: 387-5629 E-mail: OIPC@gems5.gov.bc.ca

The Information and Privacy Commissioner is David Loukidelis

