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# BC Conference

## The United Church of Canada

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### Protection of Personal Information Policy

BC Conference understands that personal privacy is a critical issue for our beneficiaries, donors, and employees. This privacy policy outlines our principles and procedures regarding the confidentiality and security of personal information given to us by beneficiaries, donors and employees.

This privacy policy outlines the principles this Conference applies when protecting the personal privacy of beneficiaries, donors and employees. We believe that ensuring the accuracy, confidentiality, and security of the personal information we hold is both a legal and ethical obligation.

This privacy policy is based on the B.C. Provincial Personal Information Privacy Act (PIPA) (Bill 2003 – 38). Based on this we have prepared our own ten privacy principles to meet the specific needs of both BC Conference, and the beneficiaries, donors and employees of this Conference.

#### **Scope**

This policy applies to BC Conference, a Conference of The United Church of Canada. It outlines the principles and commitments we make to our beneficiaries, donors and employees, to protect personal information.

#### **Definitions**

“BC Conference” is a Conference of The United Church of Canada.

“Collection” is the act of gathering, acquiring, or obtaining personal information from any source, by any means.

“Consent” involves voluntary agreement with what is being done or proposed. Consent may be expressed in writing, or verbally, or tacitly. Implied consent exists when the church can reasonably infer consent based upon the action of the beneficiary, donor or employee.

“Beneficiary”, means any person who makes use of the services, programs and activities of BC Conference.

“Donor” means anyone who contributes their financial resources to the work of BC Conference.

“Employee” means anyone who is employed by BC Conference on a permanent or contract basis.

“Disclosure” is the act of making personal information available to others.

“Use” is the treatment and handling of personal information by and within BC Conference.

“Personal Information” is information about an identifiable individual that is recorded in any form, excluding the person’s name, business title, business address and business phone number.

“Third-Party” is an individual or organization other than BC Conference, and its beneficiaries, donors and employees.

## **Section 1: The Accountability of BC Conference**

- 1.0 BC Conference is accountable for the protection of the private information of beneficiaries, donors and employees.
- 1.1 The overall responsibility of the protection of personal information, and compliance with this Privacy Policy rests with the BC Conference Privacy Officer.
- 1.2 This Conference is committed to ensuring that appropriate security measures are used in the transfer of sensitive private information. When using email or wireless communication, we advise beneficiaries, donors and employees that complete confidentiality and security are not assured.
- 1.3 BC Conference is not accountable for any damages suffered when a beneficiary, donor or employee transmits personal information through email or wireless communication, or when BC Conference transmits such information at the request of the member.
- 1.4 BC Conference has developed policies and procedures to: protect personal information; receive and respond to complaints and inquiries; train staff regarding the policies and procedures; and communicate the policies and procedures to our beneficiaries, donors and employees.

## **Section 2: Identifying the Purposes of Personal Information**

- 2.0 BC Conference will communicate the purposes for which information is being collected, either orally or in writing.
- 2.1 BC Conference collects personal information for the following reasons only:
  - The administration of matters related to the employment of permanent or contract staff.
  - The administration of matters related to purchasing goods and services.
  - To maintain donor records and issue charitable tax and other receipts.
  - To provide services that will meet the spiritual, educational and human needs of our beneficiaries, donors and employees.
  - To provide information for Conference programs and services.
  - To maintain adequate stewardship or care for our human and financial resources.
  - To adequately promote the mission and outreach services of the Conference, its Presbyteries and the national United Church.
  - To verify the identity of a beneficiary, donor or employee.
  - To provide for the transfer of appropriate records to our Conference and national Archives for archival and research purposes.

## **Section 3: Consent from Beneficiaries, Donors and Employees**

- 3.0 BC Conference will obtain consent from beneficiaries, donors and employees for the collection, use or disclosure of any personal information except where detailed in this Privacy Policy. We will make reasonable efforts to ensure that beneficiaries, donors and employees will understand how their personal information will be used and disclosed.
- 3.1 The consent of a beneficiary, donor or employee can be written, spoken, or tacit. A beneficiary can withdraw consent at any time, but such withdrawal may also inconvenience the beneficiary, donor or employee (i.e. charitable tax receipts, or employee pension or earnings statements). If such information is required by law, the Conference may decline to deal with a beneficiary, donor or employee who has withdrawn consent to the required information.

- 3.2 BC Conference may collect, use or disclose personal information without the beneficiary, donor or employee's knowledge or consent in exceptional circumstances:
- When such collection, use or disclosure is permitted or required by law.
  - When the use of such information is required in an emergency that threatens an individual's life, health, or personal security.
  - When certain information is publicly available.
  - When requiring legal advice from a lawyer.
  - When needing to collect a debt from a beneficiary, donor or employee.
  - When needing to deal with an anticipated breach of law.
- 3.3 Consent may be given orally, in writing, or electronically. For example, depending on the sensitivity of the information, consent can be expressed over the telephone, though this is only for the most minimally sensitive level of personal information. In other cases, where a form is needed to be filled in, one might consent by means of a check-off box. In some cases donors may wish to fill in an electronic form indicating consent. It may also be that beneficiaries or donors are asked for permission to have their home addresses or phone numbers on a list of members or participants in a program.

#### **Section 4: Limits for Collecting Personal Information**

- 4.0 BC Conference will only collect personal information for the purposes identified. We will use methods that are lawful, and will not collect information indiscriminately.

#### **Section 5: Limits for Using, Disclosing and Keeping Personal Information**

- 5.0 Personal information will only be used or disclosed for the purposes for which it was collected. If such information is used for additional purposes we will seek new consent to do so.
- 5.1 BC Conference will not sell beneficiary, member or donor lists to Third-Parties.
- 5.2 BC Conference may occasionally use beneficiary, member or donor lists to conduct surveys in order to provide better programs and services, or to do research for future planning.
- 5.3 BC Conference may send beneficiary, member and donor lists to other offices of The United Church of Canada in order that they may provide information for "Every Member Plan" United Church Observer subscriptions, or in order that our General Council and Conference offices may send out information on issues of stewardship, outreach and other concerns of our national church.
- 5.4 BC Conference will transfer records to the B.C. Conference Archives, in order that the long-term legal and business purposes of the church, and its archival and research purposes can be continued with appropriate care. The majority of personal information is not preserved at the archives, but some records are archival in their nature and will be preserved.

#### **Section 6: Accuracy**

- 6.0 BC Conference will make reasonable efforts to ensure that any personal information collected is accurate, complete and current. In most cases, we rely on the beneficiaries, donors and employees to keep certain information current, complete and accurate.
- 6.1 Beneficiaries, donors and employees may request amendments to the records at BC Conference in order to ensure the accuracy and completeness of their personal information. If the amendment

request pertains to information that remains in dispute, the Conference will note the person's opinion in the file.

### **Section 7: Safeguarding Personal Information**

- 7.0 BC Conference is committed to the safeguarding of the personal information of beneficiaries, donors and employees in order to prevent its loss, theft, unauthorized access, disclosure, duplication, use or modification.
- 7.1 Depending on the sensitivity of the personal information, BC Conference will employ appropriate security measures to protect the information. The measures may include, for example, the physical security of offices, locked filing cabinets, and electronic security measures such as computer passwords.
- 7.2 BC Conference will use appropriate security measures when disposing of personal information, computers no longer in use, and other storage devices. This will, for example, involve the shredding of paper records containing personal information, and the reformatting of computers and storage systems no longer in use.

### **Section 8: Availability of Policies and Procedures**

- 8.0 BC Conference is transparent about the policies and procedures it uses to protect the personal information of beneficiaries, donors and employees. Information about these policies and procedures will be made available in written format in plain language. However, to ensure the integrity of our security procedures, we may refuse to publicly disclose certain information.
- 8.1 BC Conference will make the following information available:
- The name, title, and address of the Privacy Officer who can respond to requests for information on personal information policies and procedures, and to whom complaints or inquiries can be forwarded;
  - A description of the type of personal information held by BC Conference, including a general account of its use;
  - A copy of any brochures or other information that explain the policies and procedures; and
  - An explanation of what personal information is made available to related organizations within the United Church.

### **Section 9: Providing Access to Personal Information**

- 9.0 Beneficiaries, donors and employees have a right to have access to their personal information held by BC Conference. Upon request, the church will, within a reasonable time period, tell the beneficiary, donor or employee what personal information it has, what it is being used for, and to whom it has been disclosed, if applicable, and within the time period for which records are available.
- 9.1 Beneficiaries, donors or employees may be asked to be specific about the information they would like to have access to, and to submit their request in writing to the Privacy Officer of the Conference.
- 9.2 Beneficiaries, and donors will be required to provide personal information to identify themselves to enable BC Conference to provide an account of the existence, use and disclosure of personal information.
- 9.3 BC Conference will make the information available within 30 days, or provide written notice of extension where additional time is required to fulfill the request. The notice of extension note will

advise of the new time limit, the reasons for extending the time, and of the right of the beneficiary, donor, or employee to make a complaint to the B.C. Privacy Commissioner regarding the extension.

- 9.4 The information will be made available at a cost that will vary with the type and amount of information requested. If the information is extensive, the Conference will inform the member of the cost, and request further direction from the individual as to whether or not the Conference should proceed with the request.
- 9.5 If a request for information is refused, the Conference will notify the individual in writing, documenting the reasons for refusal and resources for redress available to the beneficiary, donor or employee. These reasons may include:
- the information is unreasonably costly to provide;
  - the information could threaten the security of another individual;
  - the information was generated in a formal dispute resolution process;
  - the information contains references to other individuals;
  - the information cannot be disclosed for legal or security reasons;
  - the information is subject to solicitor-client or litigation privilege.
- 9.6 If the information is demonstrated to be inaccurate or incomplete, BC Conference will amend the information as required.

#### **Section 10: Compliance and Complaints**

10.0 Beneficiaries, donors or employees are to direct any complaints, concerns or questions regarding this privacy policy in writing to the Privacy Officer of BC Conference. If the Privacy Officer is unable to address the individual's concerns, the issue can be referred to an appeal committee made up of the Privacy Officer, the President of BC Conference, the President-Elect of BC Conference, and the immediate Past President. If any of the individuals in these positions are in conflict regarding the individual making the complaint, they should be excused from participation in the appeal committee. It may be that a wise member from another Conference can be brought in to help with the deliberations. If this appeal process does not prove satisfactory, the complainant is always invited to write to the Provincial Privacy Commissioner's office.

#### **Contact Information:**

Rev. Doug Goodwin  
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BC Conference,  
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