ANGLICAN DIOCESE
OF BRITISH COLUMBIA

PRIVACY POLICY AND PROCEDURES

I. POLICY

The Diocese, including its offices, agencies, parishes, employees, volunteers and other representatives, will adhere to the provisions of the Personal Information Protection Act (PIPA) relating to the collection, accuracy, protection, use, retention, archival transfer and disclosure of personal information.

As defined in the Act, personal information consists of all data about an identifiable individual, including employees but excluding their work contact information and work product information. Among other individuals, the Diocese holds personal information of employees, volunteers, other representatives, parishioners and donors.

i. Consent

In accordance with Part 3 of P/PA, the Diocese will collect, use and disclose the personal information of an individual for reasonable, specified purposes if the person has provided consent, has been provided notice and given a reasonable opportunity to decline, or as otherwise authorized under the Act. The form of consent will be appropriate for the degree of sensitivity of the personal information. The specific type of collection, use or disclosure will cease on the subsequent withdrawal of consent unless the information is required by the Diocese to meet a legal obligation.

In accordance with section 8 of the Act, an individual is deemed to have provided consent if, at the time that the consent is deemed to have been given, the purpose would have been considered obvious to a reasonable person.

ii. Collection

The Diocese will collect personal information in compliance with Part 4 of P/PA, along with the general guidelines under Consent (above). A reasonable amount of personal information will be gathered only for acceptable purposes, and must be gathered directly from the individual concerned after the person has been informed of the purposes of the collection.

iii. Use

Personal information will be utilized in accordance with Part 5 of P/PA, along with the general guidelines under Consent (above). It may be used only for the purposes for

which it was collected unless an individual consents to a new use or the Act authorizes a new use without consent.

iv. Disclosure

Personal information will be disclosed in accordance with Part 5 of PIPA, along with the general guidelines under Consent (above). It may be disclosed only for the purposes for which it was collected unless an individual consents to a new disclosure or P/PA authorizes a new disclosure without consent. In accordance with the Act, under prescribed conditions some personal information may be disclosed for research and statistical purposes.

Personal information may be released for archival or historical purposes if its disclosure is not too sensitive, a research agreement meeting prescribed requirements is in place, the information is about someone who has been dead for twenty or more years, or the information is in a record which has been in existence for one hundred or more years.

v. Accuracy

In accordance with Part 9 of P/PA, the Diocese make a reasonable effort to ensure that personal information is accurate and complete if it is likely to be used to make a decision which affects the individual to whom it relates or is likely to be legally disclosed to another organization.

vi. Protection

Personal information will be protected in accordance with Part 9 of P/PA, through reasonable security arrangements to prevent its unauthorized access, collection, use, disclosure, copying, modification or disposal. With the exception of officially designated archival records, documents containing personal information will be destroyed in a secure manner (including shredding of hard copy records, secure destruction of computer disks, etc.).

vii. Retention

In accordance with Part 9 of P/PA, the Diocese must destroy or anonymize its documents containing personal information as soon as the purpose for which it was collected is no longer being served, and retention is no longer needed for additional legal or business purposes. However, if the personal information is used to make a decision which directly affects an individual, it must be retained at least one year after its use so that the individual has a reasonable opportunity to gain access to it. Retention of officially designated archival records is considered a business purpose.

II. REQUEST AND COMPLAINT PROCESS

In accordance with sections 5,23 and 24 of P/PA, individuals may access their own personal information subject to limited exceptions, and may enquire about its use by the Diocese. They may also register a complaint, and request that an error or omission be corrected. All enquiries must be made to the Bishop in writing. A request or complaint must provide sufficient detail to identify all relevant personal information.

Fees may be assigned to recover the administrative cost of responding to a request.
As PIPA requires the designation of one or more Privacy Officers, the Bishop has appointed the Executive Officer and the Director of Administration and Finance to provide privacy advice and assistance.

Also as required under the Act, the following contact information is provided:

Address: 900 Vancouver Street. Victoria British Columbia V8V 3W, Canada
Office hours: 8:30 a.m. to 4:30 p.m.
Telephone (250) 386-7781
Fax (250) 386-4013
E-mail: synod@bc.anglican.ca

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Attachment A – -SAMPLE STATEMENT OF PURPOSES FOR A DATA COLLECTION FORM

For a form collecting names, contact information and other information for **a parish membership list**, the following statement could be added at the end.

The personal information collected on this form will be used for these purposes:

responding to administrative audits / compiling statistical information / mailing announcements and other information / notifying members of events / providing members' information to each other / placing a membership list on a public website

Please notify the parish office if you would prefer that your name and / or contact information not be provided to other members / be placed on a public website.

(one or more of these statements could appear on a form, depending on a parish 's own purposes)

The above statement can be modified for workshop registration forms, etc.

Attachment B SAMPLE PHOTO RELEASE FORM

PHOTOGRAPH / IMAGES RELEASE FORM

I, _____ hereby give the Diocese of British Columbia consent
(print name)
to use photographs/images taken of me on _____, 20___.

I agree that the Diocese of British Columba is the owner of the photograph(s) / video images / other image(s)
(circle one or more)

and may use them on a public website / in promotional material / in other publications / in public exhibits (circle one or more) without further notification and without payment to me of any fees or royalties.

_____ _____
Signature Date

Attachment C - CONFIDENTIALITY AGREEMENT

CONFIDENTIALITY AGREEMENT

Diocese of British Columbia

(for use by Diocesan employees, contractors, volunteers and other representatives)

All confidential information heard, collected, created or viewed by employees, contractors, volunteers and other representatives of the Diocese of British Columbia must be used only for the performance of their duties and cannot be disclosed to anyone other than those authorized to receive it, both during a period of affiliation with the Diocese and beyond it.

Confidential information includes, among other examples: business plans; reports not yet made public; budgets; et cetera. It also includes the personal information of identifiable individuals, which is covered by the BC Personal Information Protection Act (PIPA) in addition to this policy. Examples of personal information are: parish membership lists; contact information of event participants; some elements of baptismal, marriage and burial registers; et cetera. Personal information must be collected, recorded, corrected, accessed, altered, used, disclosed, retained and removed only in accordance with PIPA and Diocesan guidelines, and must be maintained in a secure manner.

Employees, contractors, volunteers and other representatives who are unsure whether information is confidential should check with their supervisors before using or disclosing it.

Further information about the application of this policy may be obtained from the Executive Officer or the Director of Administration and Finance at the Diocesan Synod Office.

Statement of Agreement

I have read and understand this policy.

_____	_____	_____
Name	Signature	Date

Two copies needed (a signed one for the Diocese and unsigned one for the employee, contractor, volunteer or other representative).