

**PENINSULA UNITED CHURCH  
POLICIES AND PROCEDURES**

**1.0 PRIVACY POLICY**

**2.0 DATE APPROVED: May 15, 2018      REVIEW DUE DATE: *May 2021***

**3.0 RESPONSIBLE COMMITTEE:** Council

**4.0 UCC MANUAL/GUIDELINE/OTHER REFERENCES:**

- United Church of Canada Manual 2013 – Part A, Bylaw 5.3  
[http://www.united-church.ca/files/handbooks/manual\\_2013.pdf](http://www.united-church.ca/files/handbooks/manual_2013.pdf)
- United Church of Canada Privacy Standards Policy
- ([www.peninsulaunited.com/pages/privacy-policy](http://www.peninsulaunited.com/pages/privacy-policy))

**5.0 PURPOSE:**

The purpose of the Privacy Policy of Peninsula United Church is to ensure the Council carries out its responsibilities and duties in accordance with the Privacy Standards Policy of the United Church of Canada, and the applicable laws of the Province of British Columbia and the Government of Canada.

The Privacy Policy outlines principles and procedures regarding the protection of personal privacy, confidentiality and security of personal information given to us by members, adherents, donors and employees.

The Privacy Policy affirms that ensuring the accuracy, confidentiality, and security of the personal information we hold is both a legal and ethical obligation.

**6.0 POLICY and RELATED PROCEDURES**

This privacy policy is based on the B.C. Personal Information Privacy Act (PIPA) SBC 2003, c.63. Based on this we have prepared our own ten privacy principles to meet the specific needs of both Peninsula United Church, and the members, adherents, donors and employees of this Pastoral Charge.

**Scope:**

This policy applies to Peninsula United Church, Surrey, B.C., a Pastoral Charge of The United Church of Canada. It outlines the principles and commitments we make to our members, adherents, donors and employees, to protect their personal information.

**Definitions:**

- “Peninsula United Church, Surrey, B.C.” is a Pastoral Charge 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 member, adherent, donor or employee.

- “Member” and “Adherent” (for the purposes of this policy) mean anyone who makes use of the services, programs and activities of Peninsula United Church.
- “Donor” means anyone who contributes financial resources to the work of Peninsula United Church.
- “Employee” means anyone who contributes time and talent to the work of Peninsula United Church, whether on a paid or voluntary basis. This definition includes a volunteer solely for purposes of this policy and the Personal Information Privacy Act (PIPA) and is not applicable to the definition of employee under any other statute or law or common law or for any other purpose.
- “Disclosure” is the act of making personal information available to others.
- “Use” is the treatment and handling of personal information by and within Peninsula United Church.
- “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.
- “Privacy Officer” means a Full Member of the Congregation as defined by Section 3 of Part B of the Manual 2016, who has been appointed by the Council to administer and implement the Privacy Policy of Peninsula United Church.
- “Third-Party” is an individual or organization other than Peninsula United Church, and its members, adherents, donors and employees.

***Section 1: The Accountability of Peninsula United Church***

**1.0** Peninsula United Church is accountable for the protection of the personal information of members, adherents, donors and employees.

**1.1** The overall responsibility of the protection of personal information, and compliance with this Privacy Policy is assigned to the Privacy Officer appointed by the Council, or to the Council if a Privacy officer has not been assigned.

**1.2** This United Church Pastoral Charge is committed to ensuring that appropriate security measures are used in the transfer of sensitive personal information. When using email or wireless communication, we advise members, adherents, donors and employees that complete confidentiality and security are not assured.

**1.3** Peninsula United Church is not accountable for any damages suffered when a member, adherent, donor or employee transmits personal information through email or wireless communication, or when Peninsula United Church transmits such information at the request of the member, adherent, donor or employee.

**1.4** Peninsula United Church has developed policies and procedures to: protect personal information; receive and respond to complaints and inquiries; train staff regarding the policies and procedures; communicate the policies and procedures to our members, adherents, donors and employees.

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

**2.0** Peninsula United Church will communicate the purposes for which information is being collected, either orally or in writing.

**2.1** Peninsula United Church collects member personal information for the following reasons only:

- To provide information for church programs and services.
- To maintain donor records and issue charitable tax receipts.
- To maintain adequate stewardship or care for our human and financial resources.
- To provide services that will meet the spiritual, educational and human needs of our members, adherents, donors and employees.
- To promote the mission and outreach services of both our Pastoral Charge and the United Church of Canada.
- To verify the identity of a member, adherent, donor or employee.
- To provide for the transfer of appropriate records to our Conference Archives for archival and research purposes.

### ***Section 3: Consent from Members, Adherents, Donors and Employees***

**3.0** Peninsula United Church will obtain consent from members, adherents, 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 members, adherents, donors and employees will understand how their personal information will be used and disclosed.

**3.1** The consent of a member, adherent, donor or employee can be written, spoken, or implied. A member can withdraw consent at any time, but such withdrawal may also inconvenience the member, adherent, donor or employee (i.e. charitable tax receipts, or employee pension or earnings statements). If such information is required by law, the Pastoral Charge may decline to deal with a member, adherent, donor or employee who has withdrawn their consent to the required information.

**3.2** Peninsula United Church may collect, use or disclose personal information without the member, adherent, donor or employee's knowledge or consent in the following exceptional circumstances:

- When such collection, use or disclosure is permitted or required by law.
- When using such information is required in an emergency that threatens an individual's life, health, or personal security.
- When certain information is publicly available.
- When we require legal advice from a lawyer.
- When we need to collect a debt from a member, adherent, donor or employee.
- When we need 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 members, adherents 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** Peninsula United Church 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 to be used for additional purposes, we will seek new consent to do so.

**5.1** Peninsula United Church will not sell or provide membership, adherent or donor lists to Third-Parties.

**5.2** Peninsula United Church may occasionally use membership, adherent or donor lists to conduct surveys in order to provide better programs and services, or to do research for future planning.

**5.3** Peninsula United Church may send membership, adherent and donor lists to other offices of the United Church in order that they may provide information for “Every Member Plan” United Church Observer subscriptions, or in order that our General Council, Conference and Presbytery offices may send out information on issues of stewardship, outreach and other concerns of our larger church.

**5.4** Peninsula United Church 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** Peninsula United Church will make reasonable efforts to ensure that any personal information collected is accurate, complete and current. In most cases, it will rely on the members, adherents, donors and employees to keep certain information current, complete and accurate.

**6.1** Members, adherents, donors and employees may request amendments to the records at Peninsula United Church, in order to ensure the accuracy and completeness of their personal information. If the amendment request pertains to information that remains in dispute, the Pastoral Charge will note the person’s opinion in the file.

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

**7.0** Peninsula United Church is committed to the safeguarding of the personal information of members, adherents, 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, Peninsula United Church may 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** Peninsula United Church 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.
- 7.3** Browsing on Peninsula United Church's website is private. No cookies are used to collect data and/or follow users around the internet. Peninsula United Church's website does use Google Analytics, but the cookie does not collect or store any personal data that could identify the user. It does store non-specific data such as the country where the site is accessed, time/day/week/month of visit, and pages visited. The cookie exists only during the visit to the website and is automatically deleted when the browser is closed or the browser window that contains the website is closed.

While PUC does not incorporate cookies on its site, we have no influence or control over the processing of personal data by other entities if visitors use external links found on the website.

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

**8.0** Peninsula United Church is open about the policies and procedures it uses to protect the personal information of members, adherents, 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** Peninsula United Church 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 Peninsula United Church, 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** Members, adherents, donors and employees have a right to have access to their personal information held by Peninsula United Church. Upon request, the church will, within a reasonable time period, tell the member, adherent, 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** Members, adherents, 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 Pastoral Charge.
- 9.2** Members, adherents, and donors will be required to provide personal information to identify themselves to enable Peninsula United Church to provide an account of the existence, use and disclosure of personal information.
- 9.3** Peninsula United Church 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 member, adherent, 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 reasonable cost that will vary with the type and amount of information requested. If the information is extensive, the Pastoral Charge will inform the member of the cost, and request further direction from the individual as to whether or not the Pastoral Charge should proceed with the request.
- 9.5** If a request for information is refused, the Pastoral Charge will notify the individual in writing, documenting the reasons for refusal and resources for redress available to the member, adherent, donor or employee. These reasons may include that it is unreasonably costly to provide, that the information could threaten the security of another individual, or that it was information generated in a formal dispute resolution process, or that the information contains references to other individuals, or that the information cannot be disclosed for legal or security reasons, or that it is information that is subject to solicitor-client or litigation privilege.
- 9.6** If the information is demonstrated to be inaccurate or incomplete, Peninsula United Church will amend the information as required.

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

**10.0** Members, adherents, donors or employees are to direct any complaints, concerns or questions regarding this privacy policy in writing to the Privacy Officer, or to the Chair of Council if a Privacy Officer has not been appointed. 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 Chair of the Council of Peninsula United Church, the Chair of the Ministry and Personnel Committee, and one of the Ministry Personnel in the Pastoral Charge. If any of the individuals in these positions are in conflict regarding the individual making the complaint, they will be excused from participation in the appeal committee and a substitute will be appointed by the Council. It may be that a wise member from another Pastoral Charge can be brought in to help with the deliberations. If this appeal process does not resolve the matter, the complainant is always able to write to the Provincial Privacy Commissioner's office.

**Appendix:** Peninsula UC Privacy Policy Short Form