

SECTION 4 - GENERAL POLICIES

Origin: TOTP Administration Committee

Status: Policy

Distribution: All Parishes

Approved: Coordinating Council

Date: 30 October 2009

Revision: Approved Coordinating Council

Date: 21 November 2020

4.1 PRIVACY POLICY

4.1.1 Introduction

The BC Personal Information Protection Act (PIPA) regulates the way private sector organizations within British Columbia collect, use, keep, secure and disclose personal information. “Personal Information” means all information about an identifiable individual. The Territory recognizes the importance of privacy, and the sensitivity of personal information received by us for church purposes.

The Territory of the People (the Territory), 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 (see Appendix A). Among other individuals, the Territory holds personal information of employees, volunteers, other representatives, parishioners and donors.

4.1.2 Consent

In accordance with Part 3 of PIPA, the Territory 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 Territory 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 the consent is deemed to have been given, the purpose would have been considered obvious to a reasonable person.

4.1.3 Our Need for Personal Information

Information is given to the Territory for Church purposes and will only be used for Church purposes.

4.1.4 Collection, Use, Disclosure and Disposal of Personal Information

The Territory's database is available electronically in office to Territory office staff solely for the purposes of carrying out their work tasks.

Directories are provided in printed form to office staff, Incumbents and priests-in-charge to facilitate communication and administrative functions within the Territory. Territory and parish personnel are required to use the information with care. Out-of-date lists are to be destroyed.

All information in the Territory's Directories, with the exception of the Personal Address List, is to be considered public domain. The Personal Address List is to be handled in a confidential manner.

At this time, e-mail addresses are to be considered confidential information.

Commercial use of the Territory and Parish Church Lists are not allowed.

All paper waste containing confidential information is to be shredded where possible using cross-cut shredders. CD's are to be disposed of so their information is not retrievable.

4.1.4.1. Collection of Data

The Territory will collect personal information in compliance with Part 4 of the British Columbia Personal Information Protection Act (PIPA), 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

4.1.4.2. Use

Personal information will be utilized in accordance with Part 5 of PIPA, 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.

4.1.4.3. 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 PIPA 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.

4.1.4.4 Accuracy

In accordance with Part 9 of PIPA, the Territory will 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.

4.1.4.5 Retention

In accordance with Part 9 of PIPA, the Territory 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.

4.1.5 Security of Personal Information

Personal information will be protected in accordance with Part 9 of PIPA, 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.).

The Territory recognizes its obligation to protect the confidential information of its members. We have arrangements in place to secure against the unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information.

To safeguard from unauthorized access, information is kept in locked cabinets or locked offices. Electronic data are password protected.

4.1.6 Requests for Access to Personal Information

In accordance with sections 5.23 and 24 of PIPA, individuals may access their own personal information subject to limited exceptions, and may enquire about its use by the Territory.

The PIPA permits individuals to submit written requests to provide them with the following:

- Their personal information under our custody or control; and
- Information about how their personal information under our control has been used and is being used by us; and
- The names of any individuals and organizations to which their personal information under our control has been disclosed by us.

If there is a request for information which is considered beyond the intent for which the information was originally given, consent must be received from the information source before the information may be released.

We will respond to requests within the time allowed by the Personal Information Protection Act, and will make every effort to respond as accurately and completely as reasonably possible.

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 Office Coordinator and Counsel to the Bishop to provide privacy advice and assistance.

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

Address:

The Territory of the People, 360 Nicola Street, Kamloops BC V2C 2P5

Office Hours: Tuesday to Thursday, 9:30am to 4 pm

Telephone: 778-471-5573 Fax: 778-471-5586

Email: office@territory.anglican.ca

4.1.7 Requests for Correction of Personal Information

The Personal Information Protection Act allows individuals to submit written requests to correct errors or omissions in their personal information that is in our custody or control. We will review and respond to such requests in a timely manner. It is the responsibility of the individual to provide current information to those responsible for maintaining and updating lists or files.

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.

4.1.8 Contacting Us

If you have any questions with respect to our policies concerning our handling of your personal information, or if you wish to request access to, or correction of, your personal information under our care and control, please contact the Territory office.

If you are not satisfied with the way we handle your requests, you are entitled to contact the Counsel to the Bishop or in his/her absence, contact the Bishop.

For further appeal you may contact the Privacy Commissioner at:

The Office of the Information and Privacy Commissioner

PO Box 9038, Stn. Prov. Govt.,

Victoria BC V8W 9A4

Telephone: (250) 387-5629

Fax: (250) 387-1696

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 Territory of the People consent
(print name)

to use photographs/images taken of me on _____, 20 _____

I agree the Territory of the People 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

The Territory of the People Anglican Church

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

All confidential information heard, collected, created or viewed by employees, contractors, volunteers and other representatives of the Territory of the People 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 Territory 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 Territory 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 Office Coordinator at the Territory Office.

Statement of Agreement

I have read and understand this policy.

Name	Signature	Date
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Two copies needed (a signed one for the Territory and an unsigned one for the employee, contractor, volunteer or other representative).

Appendix A PERSONAL IDENTIFIABLE INFORMATION

“Personal information” is a broadly defined term that includes information that is reasonably capable of identifying a particular individual either alone or when combined with information from other available sources. Personal information includes employee personal information¹. It does not include business contact information² or work product information³.

Some examples of personal information are:

- name
- address
- gender
- education
- income
- financial information
- medical and genetic information
- date of birth
- drivers' license number
- photographs or images of an individual
- employment history
- product preferences

*Note: this is a representative list only. Other identifiable information may be available.

-From: Guidance Document: Developing a privacy policy under the Personal Information Protection Act (PIPA)

¹ Information collected, used or disclosed solely for the purposes reasonably required to establish, manage or terminate an employment relationship between the organization and an individual.

² Information used to contact an individual at their place of business for a purpose related to that business.

³ Information prepared or collected by an employee as part of that individual's work responsibilities.