

Gladwin Heights United Church (GHUC) Policies and Procedures

Privacy Breach Notification

Date Approved: October 12, 2017

Responsible Committee: GHUC Board

Overview

This document provides guidance and remedial steps required in the case of a breach of privacy or confidential information held by GHUC.

GHUC is the Custodian of the specific information collected about the congregation membership and adherents, as well as contractual parties using the building.

GHUC is also the Owner of information such as financial statements and other relevant documents that are considered to be of value to the church. Examples include Committee Reports and personnel records for both Clergy and Lay staff and volunteers.

Under the Personal Information Privacy Act (PIPA), we are required by law to act on any breach of data held by GHUC or a designate in possession of personal information.

Information held by GHUC may also be of a confidential nature related to the church and would also require immediate and remedial action be taken.

The following steps will be followed in the case of a physical or electronic breach of information/data:

1. **STOP** the breach
 - This may involve the revoking of user id's; passwords; or physical removal of the person(s)
 - If electronic, remove the access points to the data. This may be to take down a website or remove files that may be shared.
2. Contact the Privacy Officer, as well as the Board Chair.
 - Decisions will be made on the next steps for notification of particular individuals or groups who may be involved. Notification may be verbal and/or written.
 - Serious breaches may involve the Police as well as the BC Conference Office of the United Church of Canada.
 - A breach notification to the Office of the Information and Privacy Officer of BC may be undertaken, and will be determined by the Privacy Officer and Board Chair.
3. Corrective measures undertaken to find the reason for the breach and undertake corrective action in a timely way. The Privacy Officer may engage other parties to assist in this determination.
4. Advise impacted parties of the process that has been undertaken to mitigate further risk.
5. A final report will be added to a written Breach Notification to include all steps taken during and after the breach. A copy of the report will be held for five years by the Administrator on behalf of GHUC.