

Gladwin Heights United Church Policies and Procedures

Privacy Policy

Date Approved: October 12, 2017

Review date: as The United Church of Canada policy changes or as needed

At Gladwin Heights United Church (GHUC), as a local church within the Gladwin Heights/St. Andrew's Pastoral Charge of The United Church of Canada within British Columbia (BC) Conference and within Fraser Presbytery, we understand that personal privacy is a critical issue for our members, adherents, donors, and employees. This privacy policy outlines our principles and procedures regarding the confidentiality and security of personal information given to us by members, donors and employees.

This privacy policy outlines the principles GHUC applies when protecting the personal privacy of members, 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 BC 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 GHUC, the members, donors and employees of this Pastoral Charge.

Scope:

This policy applies to GHUC, Abbotsford, BC, a local church within the Gladwin Heights/St. Andrew's 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:

"GHUC" is a local church in Abbotsford, BC within the Gladwin Heights/St. Andrew's Pastoral Charge within 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) means anyone who makes use of the services, programs and activities of GHUC.

"Donor" means anyone who contributes financial resources to the work of GHUC.

“Employee” means anyone who contributes his/her time and talent to the work of GHUC, 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 GHUC.

“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 GHUC, and its members, adherents, donors and employees.

Section 1: The Accountability of GHUC

1.0 GHUC is accountable for the protection of the private information of members, adherents, donors and employees.

1.1 The overall responsibility of the protection of personal information, and compliance with this Privacy Policy rests with the GHUC Privacy Officer.

1.2 GHUC 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 members, adherents donors and employees that complete confidentiality and security are not assured.

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

1.4 GHUC has developed policies and procedures to: protect personal information; receive and respond to complaints and inquiries; and will communicate the policies and procedures to our members, adherents, donors and employees.

Note: Privacy Breach Notification Policy (October 12, 2017)

Section 2: Identifying the Purposes of Personal Information

2.0 GHUC will communicate the purposes for which information is being collected, either orally or in writing.

2.1 GHUC 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 adequately promote the mission and outreach services of both our Pastoral Charge and the larger United Church;
- To verify the identity of a member, adherent, donor or employee; and,
- 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 GHUC 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. GHUC 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 Verbal or written consent will be solicited from members, adherents, donors and employees prior to the posting of pictures and/or personal information on GHUC's website or Facebook page. E.g., birthday celebrations, church activities

3.2 Other than specified in 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, GHUC may decline to deal with a member, adherent, donor or employee who has withdrawn his/her consent to the required information.

3.3 GHUC 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; and,
- When we need to deal with an anticipated breach of law.

3.4 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 (as per 3.1), 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 GHUC 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 GHUC will not sell membership, adherent or donor lists to Third-Parties.

5.2 GHUC 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 GHUC 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 GHUC will transfer records to the BC 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. Most 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 GHUC 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 GHUC to ensure the accuracy and completeness of their personal information. Note that amendments to certain records are governed by the UCC and Government of Canada policies. 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 GHUC is committed to the safeguarding of the personal information of members, adherents, donors and employees to prevent its loss, theft, unauthorized access, disclosure, duplication, use or modification.

7.1 Depending on the sensitivity of the personal information, GHUC 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 GHUC 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 GHUC 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 GHUC 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 GHUC, 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 GHUC. 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 GHUC to provide an account of the existence, use and disclosure of personal information.

9.3 GHUC 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 BC 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, GHUC 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, GHUC 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 of GHUC. If the Privacy Officer is unable to address the individual's concerns, the issue can be referred to an appeal committee made up of GHUC's Chair of the Official Board, the Chair of the Ministry and Personnel (M&P) 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 should be excused from participation in the appeal committee and a substitute should be appointed by the Official Board. 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.

See the following page for contact information.

Contact Information:

GHUC – Privacy Officer

Patricia Lockhart (M&P Chair)

Home phone: (604) 859-9679

E-mail: patricia.lockhart@hotmail.com

Office of the Information and Privacy Commissioner,

3rd Floor, 756 Fort Street

Victoria, B.C. V8W 9A4

Web site www.oipc.bc.ca/

Phone: 250-387-5629

Toll free: 1-800-663-7867 Email: info@oipc.bc.ca

Related Links:

- Privacy Statement: The United Church of Canada
www.united-church.ca/privacy-statement
- BC Conference Privacy Policy
<https://www.bc.united-church.ca/sites/default/files/PrivacyPolicy.pdf>
- For more information on applicable federal and provincial legislation, see the website of the Office of the Privacy Commissioner of Canada (www.priv.gc.ca).