

CCMCCF's Policy of Protection of Privacy and Personal information (Policy 5.5.1)

CCM Canada Charitable Foundation is committed to the protection of privacy and personal information that the organization collect, use, disclose, store and dispose in all contacts and working relationships with the Foundation's members, clients, donors, volunteers, employees and the Board of Directors.

Personal Information means information about an identifiable individual. Some examples of personal information include:

- Name, sex, age, weight, height
- Home address and phone number
- Income, purchases and spending habits
- Race, ethnic origin, sexual orientation
- Medical information
- Marital or family status
- Religion
- Education
- Employment information

CCM Foundation policy and procedures for Protection of Privacy and Personal Information is based on the following **ten** (10) principles of privacy protection as stipulated in the Province of B.C.'s *Personal Information Protection Act* (PIPA) and the Federal *Personal Information Protection and Electronic Documents Act* (PIPEDA).¹ In compliance with these legislations, the Foundation Board, management, staff and volunteers will follow the policy closely in its day-to-day business operations.

Guidelines and Procedures:

1. Accountability

CCM Foundation is responsible for any personal information under its custody or control. All Foundation employees and volunteers, who collect, maintain and / or use personal information shall ensure that the collection, use, disclosure, storage and disposal of that personal information are carried out in compliance with this Policy.

In compliance with government legislation, CCM Foundation has a designated Privacy Officer in office. The Privacy Officer is responsible for the day to day monitoring of and compliance with this policy and related procedures.

¹ See <http://www.oipc.bc.ca> for BC (PIPA) and http://www.priv.gc.ca/leg_c/leg_c_p_e.cfm for federal (PIPEDA)

Employees and volunteers will forward inquiries and complaints about privacy / protection of personal information to the Privacy Officer.

2. **Identify and Communicate the Purposes of Collecting the Information**

Unless the purposes for collecting the personal information are obvious and the person voluntarily provides his or her personal information for those purposes, CCM Foundation will communicate explicitly the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

For the purpose of ongoing business operations, CCM Foundation shall need to collect personal information from its clients, employees, members, and donors for one or more of the following purposes:

- To verify identity
- To enrol a client/volunteer in a program
- To send out Foundation information to the person such as newsletter
- To contact for fundraising
- To gather feedback regarding service or a survey
- To establish, manage, or terminate an employment relationship
- To meet regulatory requirements by government
- To develop services to meet the needs of a donor/client/volunteer

3. **Consent**

CCM Foundation shall not use any personal information provided to it by or about any individual other than for the purpose for which that information was originally solicited, collected or created and will not disclose personal information to any third party without the knowledge and consent of the individual concerned.

The way in which the Foundation seeks consent from a person may vary, depending on the circumstances and the type of information collected. The different types of consent include:

- **Informed consent:** CCM Foundation will seek informed consent from clients, *usually orally*, before or at the time of collecting personal information. Individuals will learn from Foundation personnel the purposes for collecting the personal information, what the information will be used for and to whom the information will be disclosed.
- **Express consent:** CCM Foundation will seek express consent from donors / clients, *in written form*, when the information is likely to be considered sensitive (e.g. medical, financial, or counselling information). Where appropriate, Foundation personnel shall use consent forms to obtain

express consent from clients. The content of form may vary with different programs.

- Implied consent: it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the person *voluntarily* provides personal information for that purpose (e.g. use the information on a registration form to send course information).

CCM Foundation may collect, use, or disclose personal information about a client without consent under certain circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source (e.g., a telephone directory)

CCM Foundation respects the right of an individual to *withdraw consent* at any time. In such case, the individual should be explained of the possible consequences of the withdrawal, if applicable. Examples include newsletter will no longer be sent out or client will no longer be able to access a particular service program.

4. **Limiting Collection**

CCM Foundation shall collect personal information only for purposes that are reasonable. The amount and type of information collected is appropriate and necessary to fulfill the identified purposes.

The Foundation shall explain to the individual the purposes for collecting the piece of personal information (like why it is needed) before or at the time of information collection.

5. **Limiting Use, Disclosure and Retention**

CCM Foundation shall not use personal information for purposes other than those for which it was originally solicited or provided.

The Foundation shall not disclose personal information to any third party without the knowledge and express consent of the individual concerned. An authorization for release of information form has to be signed by the concerned individual before any information is released to a third party.

Unless new consent from an individual is collected, the Foundation will not use the personal information already collected for a new purpose.

Personal information will be retained only as long as necessary for the achievement of the purposes for which it was originally collected or as required by legislation or regulatory body.

Client files, including case records, will be kept for seven years. Closed files of children are kept until they reach the age of 19 and the seven-year retention period still applies as from the file closing date. As required by legislation, client records involving *child protection shall be retained permanently*. In terms of personnel records, staff files must be kept by CCM Foundation for at least seven years after termination of employment.

6. **Accuracy**

CCM Foundation shall make reasonable effort to ensure that the personal information under its control is as accurate, complete and current as is necessary for the purposes for which it is to be used.

Donors, clients, volunteers, and employees of CCM Foundation can request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the correction being sought.

7. **Security**

CCM Foundation is responsible for protecting the security of personal information and will safeguard personal information from loss or theft as well as unauthorized access, disclosure, copying, or modification.

These safeguards include but are not limited to:

- Physical measures: client files and employee records are securely locked in cabinets. Sensitive information will not be left unattended in areas accessible to people who are not authorized to access the information.
- Organizational measures: access to personal information is defined and restricted to staff members of the respective area of work.
- Technological measures: CCM Foundation protects information stored in computer with the use of passwords, secure networks and firewalls.

All CCM Foundation personnel shall receive training on protection of personal information including information security.

8. **Openness**

CCM Foundation shall make readily available to its clients, volunteers, and employees about its policies and practices relating to the management of personal information. The Foundation's Privacy Officer will address questions about the policy and explain the procedures of gaining access to personal information held by the organization.

9. **Access to Personal Information**

Clients, volunteers, donors, and employees have a *right to access* their own personal information, subject to limited exceptions. For example, the disclosure would reveal personal information about another individual, or information that cannot be disclosed for legal, security, and other reasons.

A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. Upon request, CCM Foundation shall within 30 days inform that individual of the existence, use, and disclosure of his or her personal information and provide him or her with access to that information.

If the requested information is unavailable within 30 business days, CCM Foundation will provide written notice of an extension where additional time is required to fulfill the request.

If a request is refused in full or in part, CCM Foundation will notify the individual in writing, providing the reasons for refusal and the recourse available to the member.

If the personal information is shown to be inaccurate or incomplete, the individual may request correction of the information and CCM Foundation is to amend the information as required.

10. **Questions and Complaints**

The Foundation management appoints a Privacy Officer. This person is responsible for ensuring the Foundation's compliance with this policy. Individuals should direct any questions and complaints about the Foundation's compliance with the legislation to the Privacy Officer.

The Privacy Officer shall investigate all complaints and take appropriate measures to correct information handling practices and policies. If the Privacy

Officer is unable to resolve the concern, the individual may present the issue to the Foundation chief executive officer. If the issue is not resolved, the individual may write to the Chair of the CCM Foundation's Board of Directors.

Contact Information of CCM Foundation's Privacy Officer:

Name:

Address: 4533 Kingsborough St., Burnaby, B.C., V5H 4V3

Phone: (604) 877-8606 **Email:**

The individual who raises question or makes complaint can contact the Privacy Commissioner for British Columbia or the Privacy Commissioner of Canada if the issue is not satisfactorily resolved with CCM Canada Charitable Foundation.

Responsibility of the Privacy Officer:

1. Monitor the day-to-day implementation of CCM Foundation's Protection of Personal Information Policy and Procedures.
2. Serve as the contact person for enquiries about protection of personal information from donors, clients, employees, volunteers, and the general public.
3. In accordance with the policy, provides guidance and support to staff members in response to third party request for release of information.
4. On an annual basis, file a report and make recommendations (if any) to Foundation's chief executive director / Board regarding improvement in the organization's Protection of Personal Information Policy and Procedures. This includes proposed actions in response to any change in legislation by government.