

St. Andrews Presbyterian Church Policy to Protect Personal Information

Purpose:

This policy is to safeguard personal information entrusted to St. Andrews Presbyterian Church and to comply with the requirements of the Personal Information Protection and Electronic Documents Act (PIPEDA) and any other applicable legislation.

Privacy Principles:

St Andrews Presbyterian Church is committed to maintaining the accuracy, confidentiality and security of all personal information in its possession. The Church, its Session, Board members, officers, employees and volunteers are required to comply with this policy. As part of this commitment St. Andrews Presbyterian Church has adopted the following ten principles, based on the values set by the Canadian Standards Association's Model Code for the Protection of Personal Information and Canada's Personal Information Protection and Electronic Documents Act.

1. Accountability

St. Andrews Church has appointed a Privacy Officer who is responsible for the organization's compliance with this policy. Each Board, Committee, employee and volunteer is responsible for maintaining and protecting the personal information under its control and is accountable, for such information, to the Privacy Officer.

2. Identifying purposes

St. Andrews Church collects and uses personal information about individuals solely for the following purposes:

- a. To enable communication;
- b. To provide income tax receipts; and,
- c. To meet statutory and regulatory requirements.

[Note: This list will be amended based on information collected during the privacy audit]

Business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone and church directories, are not considered personal information.

The only circumstance under which personal information may be disclosed to third parties is for the fulfillment of any purposes identified above, or as required by law.

Where personal information is disclosed to third parties for the fulfillment of any purposes identified above, the church will make all reasonable efforts to ensure that the

third party has appropriate security procedures in place for the protection of the personal information being transferred.

3. Consent

Unless noted otherwise, provision of personal information on official church forms, constitutes consent for the Church to collect, use and disclose personal information for the purposes stated in this policy.

An individual may refuse or withdraw consent at any time, subject to legal and contractual restrictions and reasonable notice. The choice to provide personal information is always the individual's. Decisions to withhold particular information may impact one's ability to meet specific requirements for the provision of certain services.

An individual may refuse or withdraw consent by contacting the Privacy Officer at staprivacyofficer@gmail.com or by contacting the church office. The Privacy Officer will explain the options and any consequences of refusing or withdrawing consent, and will record the individual's choice.

Exceptions to Consent

There are exceptions to the disclosure of personal information. Following is listing of circumstances and situations that are exceptions to consent:

- If the information to be collected is clearly in the individual's best interest and consent is not readily available in a timely way.
- If personal information is required for legal reasons.
- If information is for journalistic, artistic, literary purposes or is for statistical or scholarly research purposes.
- If the information is publicly available.
- If the information is needed for an emergency that threatens an individual's life, health or security

4. Limiting collection

The personal information the church collects shall be limited only to that which is necessary for the purposes identified.

5. Limiting use, disclosure and retention

The personal information the church collects will only be used or disclosed for the purposes for which it was collected, unless an individual has consented or when it is required or permitted by law. Personal information will be retained only as long as is necessary for the fulfillment of the purposes for which it was collected, or as required by law

6. Accuracy

St. Andrews Church will make all reasonable efforts to ensure that personal information is as accurate, complete, and current as required for the purposes for which it was collected. If an individual finds any inaccuracies in the information,

they should inform the Privacy Officer who will make the appropriate corrections promptly. In some cases, the church relies on the individual to ensure that certain information, such as mailing address, email address and telephone number, is current, complete and accurate

7. Safeguards

St. Andrews Church uses appropriate security safeguards to protect personal information from risks such as loss, misuse, unauthorized access, disclosure, or alteration. Safeguards include physical, administrative, and electronic security measures. All employees and volunteers of the church are required to abide by the privacy standards that have been established. They are also required to work within the principles of ethical behavior and must follow applicable laws and regulations. In the course of daily operations, access to personal information is restricted to those employees and volunteers whose job responsibilities require them to access it.

8. Openness

St. Andrews Church will provide information to individuals about our policies and procedures relating to the overall management of personal information that is under our control or with regard to specific personal information about which an individual may have a concern. Contacting the Privacy Officer at 519 843 8856 or by email at staprivacyofficer@gmail.com can access this information.

9. Access

An individual has the right to access their personal information under the control of the church. Upon request in writing to the Privacy Officer at the address listed below, the individual will be informed of the existence, use, and disclosure of their personal information and will be given access to the information. In certain exceptional situations, the church may not be able to provide access to certain personal information that it holds about an individual. For example, the church may not provide access to personal information if doing so would reveal personal information about a third party. If access cannot be provided, St. Andrews Church will notify the individual, in writing, of the reasons for refusal.

10. Handling enquiries and complaints

Any questions or enquiries concerning compliance with these privacy policies and procedures may be addressed to the Privacy Officer by telephone at 519 843 8856, by email at staprivacyofficer@gmail.com or by regular mail at:

Privacy Officer
St. Andrews Presbyterian Church
325 St. George Street West
Fergus, Ontario
N1M 1J4

11. Online Information and Donations

St. Andrews will not share personal information with any external organization. All online donations will be protected by a reasonable level of security encryption to ensure the secure exchange of data between an individual and the payment engine.

12. Revisions to this policy

The development of the St. Andrews Church's policies and procedures for the protection of personal information is an ongoing process. Due to changes in technology and legal requirements, the church may revise this policy not less than every two years (biannually).

For a copy of the current version of this policy, please contact:

St. Andrews Privacy Officer

by phone - 519 843 8856,

by email – staprivacyofficer@gmail.com or,

by viewing the policy on the church's website, **www. standrews.org**

February 2019

St. Andrew's Presbyterian Church
Legal Requirements for the Collection of Personal Information of Children and Adults

"Personal Information" is:

- Name, address
- Health number
- Financial information
- Anything related to the person's health care
- Identity of the person's health care provider
- Images of identifiable individuals
- Use of video capture devices (whether or not the video is recorded)

When collecting information on children:

- Personal information on children is sensitive, especially the younger they are
- Under age 13, parental permission must be sought for the collection of personal information of children
- From age 13-18, request for consent must be adapted to consider the child's level of maturity and parents should be involved in the decision
- Privacy law in Canada, organizations are not permitted to require that children's health number be provided to them (this is a voluntary action)
- Images of children are personal information
- Consent must be obtained for the collection, use and disclosure of photographs of identifiable persons (children and adults)
- Personal information collected must be related to a specific purpose
- When purpose for collecting the information has been fulfilled, the personal information collected must not be retained and must be completely destroyed
- When collecting personal information about a child from a third party (e. g., another church), the organization must first have the individual's (or in the case of a child, the parent's approval)
- Personal information collected must be stored securely
- Consent must be knowledgeable (the individual or the parent must know the purpose for collecting their personal information and know that they can give, withhold or withdraw consent)
- It is advisable that a child's name be anonymous if mentioned in a church's prayer chain (discretion is advisable)