

INFORMATION MANAGEMENT

PRIVACY AND INFORMATION PROTECTION POLICY

GENERAL POLICY

The Federation of BC Youth in Care Networks (FBCYICN) is committed to ensuring the protection of personal information through compliance with British Columbia's *Personal Information Protection Act* (PIPA) and other applicable legislation.

The FBCYICN offers programs, services and opportunities that may involve the collection, use and disclosure of personal information.

We are committed to protecting personal information as required by PIPA and ensuring that our privacy policies and procedures align with the best practices set by the Office of the Information and Privacy Commissioner in British Columbia.

This Privacy and Information Protection Policy outlines the principles and practices that we follow to protect our employees', volunteers', members', participants, and donors personal information. Our commitment includes ensuring the accuracy, confidentiality, security, and access to the personal information we collect, use and disclose.

We do not use or disclose personal information for any purpose(s) other than those for which it was collected, except as required by law, or with consent. We do not sell, rent, or trade the personal information we collect.

"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 information. It does not include business contact information or work product information.

POLICY & PROCEDURE DETAILS

What Information we Collect and the Purpose for its Collection

We will only collect personal information that is the minimum amount of information necessary to effectively run the programs and services we offer and to provide relevant information and materials.

Collection of personal information may be used to fulfill the following purposes:

- To verify identity;
- To identify Youth, Employee, Director, Donor, Alumni, and Community Partner/Ally preferences;
- To provide relevant information and materials to Youth, Employee, Director, Donor, Alumni, and Community Partners /Allies;

- To deliver requested services or programs;
- To enrol the Youth in a program;
- To send out membership information;
- To contact our Youth, Employee, Director, Donor, Alumni, and Community Partner/Ally for fundraising;
- To ensure a high standard of service to our Youth, Employee, Director, Donor, Alumni, and Community Partner/Ally;
- To meet regulatory requirements;

There may be other purposes then outlined above.

Except as otherwise permitted by PIPA, before or at the time of the collection of personal information from you, we will communicate the reasons for the collection, how the information will be used, and to whom it will be disclosed. We will only collect the minimum amount of personal information necessary to allow us to fulfill the stated purpose(s) for the collection.

How we Notify you of the Collection Personal Information and the Purpose

We will notify you of the reason(s) for the collection and use of the specific personal information we are requesting from you either before or at the time of the collection of that information.

This notification of the specific purpose(s) of the collection and its use may be by (verbally, email, phone, social media platforms, mail-out, in the information materials we send to you).

We will collect personal information from you using a variety of methods, which sometimes includes but isn't limited to:

- Verbally
- Electronically
- Paper Copies

Consent

We will obtain your express consent for the collection, use or disclosure of your personal information, except where it may be reasonably implied that you have consented, or where we are authorized law to collect, use or disclose personal information without consent. Consent may be implied where the purpose for collecting, using or disclosing the personal information is for an obvious purpose, and the information is voluntarily provided.

Consent may be provided in written, or electronic form. We have a separate Media Consent Form specifically for the collection of personal information in the form of photos, videos, and audio data collection.

You will not be required to consent beyond what is necessary to provide that particular service or product of the FBCYICN. The FBCYICN will not collect, use, or disclose personal information except for the identified purposes for its collection unless we have notified you and received additional consent from you for its use for a difference purpose.

Employee Personal Information

The FBCYICN may collect, use and disclose employee personal information without consent in the following circumstances:

- Where PIPA allows the collection, use and disclosure of personal information without consent; and
- Where the collection, use or disclosure is for reasonable purposes related to the hiring, managing or termination of the employee, and provided that we have given the employee prior notification of the purpose(s) of the collection, use or disclosure of their personal information, and that we are collecting, using or disclosing their employee personal information for these stated purpose(s).

Consent from Minors

Where FBCYICN reasonably believes that a child or youth is unable to provide meaningful consent for the collection, use and disclosure of their personal information, FBCYICN may, in its sole and absolute discretion, require the parent, legal guardian or other authorized person of the child or youth to provide consent on behalf of the child or youth. In any event, consent must be obtained from the parents or guardians of anyone under the age of 13.

PIPA provides that children or youth are able to provide meaningful consent where they are able to understand the nature, consequences and purpose of what they are consenting to.

Exceptions

Personal information may be used, collected and/or disclosed without consent or knowledge in the following circumstances:

- When a reasonable person would consider that it is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- When collecting the personal information is necessary for the medical treatment of the individual and the individual is unable to give consent;
- When disclosure is needed to contact next of kin or a friend of an injured, ill or deceased individual;
- When we have a duty to report under other applicable legislation, for example, if FBCYICN reasonably believes that a child or youth under 19 years of age is being abused or neglected there may be a legal obligation to report the concern to a child welfare worker;
- When the disclosure is necessary to comply with a subpoena, warrant or order by a court or other agency with jurisdiction to compel the production of personal information; or
- When the disclosure is to a lawyer representing the organization.

Withdrawing Consent

You can cancel or change your consent for the use of your personal information at any time by giving us reasonable notice, and we will enable that request as long as doing so is permitted by law. Where a decision to withdraw or withhold consent to certain uses of your personal information restricts FBCYICN's ability to provide our services, we will explain to you the implications of such decision, for example, no longer being able to participate in our programs or services.

To withdraw from certain uses of your personal information, you can hit the unsubscribe button if available or contact us at info@fbcyicn.ca.

Disclosure of Personal Information

The FBCYICN will only disclose personal information to fulfill the purposes for which the information was collected, as authorized by PIPA, or as required by law, for example in the event of a court order, subpoena or search warrant. Before or at the time of the collection of your personal information, we will notify you to whom your personal information will be disclosed.

The FBCYICN will not disclose personal information for any additional purpose unless we obtain explicit consent to do so. If we retain another organization to do work for us that involves personal information, we will ensure there is an agreement in place that ensures this organization understands and follows the same PIPA obligations.

We will not sell personal information to third parties.

Accuracy

The FBCYICN does its best to ensure that all personal information we collect is accurate, current and complete. The FBCYICN works with Youth Members, Participants, Alumni, Employees, Donors, Community Partners and Allies to help keep their relevant personal information up to date. This information includes address, phone number, email, emergency contacts, etc.

You may request that we correct any errors or omissions in your personal information. If we are satisfied that your request for correction is reasonable, we will correct the information. Where appropriate, FBCYICN will transmit the amended information to third parties having access to the information in question.

Safeguards

FBCYICN will ensure that reasonable safeguards are in place to protect the personal information we have collected against risks such as tampering, snooping, loss, theft, unauthorized access, disclosure, copying, use, modification, or destruction. The safeguards we have in place include:

- Privacy training and compliance monitoring;
- Locked cabinets and rooms where personal information is physically stored;
- Use of passwords and/or encryption where personal information is stored electronically; and
- Restriction of access to personal information to only those require access and are authorized to access.

The FBCYICN continually reviews and updates security policies and controls as technology changes to ensure ongoing personal information security.

The FBCYICN will destroy personal information once it is no longer in use for the purpose it was collected unless it is necessary to retain the information for legal or business purposes. The FBCYICN will keep personal information used to make a decision that directly affects individuals for at least one year after it makes that decision. After that period of time has passed, the FBCYICN will securely destroy or anonymize personal information once it is no longer necessary to fulfil the identified purposes or any other legal or business purposes.

Requesting Access to Personal Information

You have the right to request access to any personal information under the control of FBCYICN. You also have the right to access information about the ways in which your personal information is or has been used, and the names of the individuals and organizations to which your personal information has been disclosed. The Privacy Security Officer will assist with access requests. Access requests should be submitted in writing to the Privacy Security Officer. In certain situations, we must refuse access. In such situations, we will state the reasons for the refusal and outline the steps available to you if you disagree with the refusal decision.

We may charge a minimal fee for providing access to your personal information and we will provide you with a fee estimate in advance if such is the case.

Changes and Updates

This Privacy and Information Protection Policy including any updates will be posted on the FBCYICN website.

Questions and Complaints

The Privacy Officer is responsible for ensuring the FBCYICN's compliance with this policy and the *Personal Information Protection Act*.

If you have questions or concerns regarding our Privacy and Information Protection Policy, its implementation, or our general practices, and/or would like to request access to your personal information, or make a complaint, please contact our Privacy Officer.

Contact information for the Privacy Officer is: info@fbcyicn.ca

REFERENCE DOCUMENTS

http://www.bclaws.ca/civix/document/id/complete/statreg/03063_01

<https://www.oipc.bc.ca/guidance-documents/1438>

<https://www.oipc.bc.ca/guidance-documents/2286>

<https://www.oipc.bc.ca/guidance-documents/1439>

<https://www2.gov.bc.ca/gov/content/employment-business/business/managing-a-business/protect-personal-information/principles>

<https://www2.gov.bc.ca/gov/content/employment-business/business/managing-a-business/protect-personal-information>

OTHER RELEVANT POLICIES

Media Consent Form