



**FIRST UNITED CHURCH COMMUNITY MINISTRY
SOCIETY
PERSONAL INFORMATION AND PROTECTION OF
PRIVACY POLICY**

Introduction

First United Church Community Ministry Society (First United) is committed to safeguarding the personal information entrusted to us by community members using our services and programs, housing and shelter residents, advocacy clients, volunteers, donors, employees, job applicants and others whose personal information we may collect. We manage all personal information in accordance with British Columbia's Personal Information and Protection of Privacy Act (PIPA). PIPA sets out rules for how organizations such as ours may collect, use and disclose personal information.

What is Personal Information?

Personal information means information about an identifiable individual such as name, home address, social insurance number or other identifying number, sex, age, financial information, marital or family status, educational history etc.

What Personal Information do we collect?

We collect only the personal information that we need for the purposes of providing services, programs and housing to individuals, as well as to raise funds and communicate with donors and supporters, including personal information needed for the following purposes among others:

- to provide advocacy referral, advice and representation;
- to register an individual to a shelter bed and provide the follow-up case support;

T: 604.681.8365

E: info@firstunited.ca

320 E Hastings St, Vancouver BC V6A 1P4

firstunited.ca

Located on unceded X^wməθkwəy̓əm (Musqueam),
Skwxwú7mesh (Squamish), & Səlilwətaʔ (Tsleil-Waututh) lands.

- to store an individual's belongings;
- to assess the need of applicants for housing;
- to determine eligibility of tenants for a rental subsidy;
- to enable us to protect the safety and security of rental accommodation for tenants;
- to assist individuals with income tax filing;
- to assist individuals in filling out rental accommodation applications, or applications for income support benefits, health benefits, legal aid, permanent residency, citizenship, identification, and other similar applications;
- to receive and distribute personal mail;
- to refer individuals to programs or enroll individuals in programs;
- to provide charitable benefits such as food or funding for travel;
- to distribute newsletters and other forms of communication;
- to appeal for funds and other types of material support;
- to provide pastoral care, or religious services such as memorial services and weddings;
- and other purposes that arise from carrying out our work.

We inform individuals before or at the time of collecting personal information of the purposes for which we are collecting the information. We do not provide this notification when an individual volunteers information for an obvious purpose, for example to receive mail, apply for housing, file taxes, receive a tax receipt for a donation, and so on.

Consent

We ask for consent to collect, use or disclose personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume consent in cases where an individual volunteers personal information for an obvious purpose.

We will inform individuals of our purpose for collecting personal information and give them a chance to refuse to provide personal information, or a chance to withdraw consent at a later time.

Individuals may withdraw consent at any time by giving reasonable notice, but cannot withdraw consent where doing so would frustrate performance of a legal obligation, such as a contract.

When individuals withdraw consent, First United will explain the likely consequences such as not being able to provide goods or services. In certain situations set out in sections 12, 15 and 18 of the Act, PIPA allows us to collect, use or disclose personal information without an individual's knowledge or consent or from a source other than the individual. Such situations include the following:

- If the collection is clearly in the interests of the individual and consent cannot be obtained in a timely way

- The collection is necessary for the medical treatment of the individual and the individual is unable to give consent
- If it is reasonable to expect that the collection with the consent of the individual would compromise the availability or the accuracy of the personal information and the collection is reasonable for a legal investigation or a civil, criminal or administrative proceeding as these terms are defined in Section 1 of the Act
- If the information was disclosed to First United under sections 12, 15 or 18 of the Act
- The personal information is necessary to facilitate the collection or payment of a debt owed to or by First United
- The personal information is collected for the purposes of the organization providing legal services to a third party and the collection is necessary for providing those services

First United may collect or use personal information from or on behalf of another organization without consent of the individual to whom the information relates if the individual consented to the collection or use of the personal information by the other organization, and the personal information is collected or used by First United solely i) for the purposes for which it was previously collected, and ii) to assist First United to carry out work on behalf of the other organization.

First United may disclose personal information to another organization without consent of the individual to whom the information relates if the individual consented to the collection of the personal information by First United, and the personal information is disclosed to the other organization solely i) for the purposes for which the information was previously collected, and ii) to assist the other organization to carry out work on behalf of First United.

We assume the continuation of consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for express consent for some purposes and may not be able to provide certain services if an individual is unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask individuals to provide their consent in writing, electronically or orally.

Limits on Collection, Use and Disclosure

First United will collect and use only personal information that is necessary to fulfill the purposes identified in this policy.

First United will not collect, use or disclose personal information except for the purposes identified to the individual, unless First United has received further consent from the individual, or is required to do so by law.

First United will collect, use or disclose information only in accordance with PIPA.

First United will not sell or rent personal information to anyone outside our organization

without consent in accordance of PIPA.

What is Employee Personal Information?

For the purposes of PIPA and this policy, “employee” includes “volunteer”. Employee personal information is personal information about an employee or volunteer which is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. It may include name, home address, home or personal phone number, social insurance number, personal health number, birth date, sex, marital or family status, employment history, volunteer history, performance reviews etc.

First United may collect, use and disclose this employee personal information without express consent if it is reasonable for purposes of establishing, managing or terminating the employment or volunteer relationship. We will provide current employees and volunteers with prior notice about what information we collect, use or disclose and our purpose for doing so.

What Employee Personal Information do we Collect, Use and Disclose?

We collect, use and disclose employee personal information for the following purposes:

- To determine eligibility for employment or volunteer work, including verifying qualifications and references
- To establish training and development requirements
- To assess performance and manage performance issues if they arise
- To administer wages and benefits for paid employees
- To process paid employee work-related claims (eg. WCB, EI)
- To comply with requirements of funding bodies
- To comply with applicable laws such as the Income Tax Act, Employment Standards Act etc.
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First United will collect, use and disclose only the amount and type of employee personal information that is reasonable to meet the above purposes. The following is a list of employee personal information that First United may collect, use and disclose to meet those purposes:

- Contact information such as name, home address, personal phone numbers and email addresses
- Criminal background checks
- Employment or volunteer information such as resumés, reference information, letters of offer and acceptance of employment, employment contracts, policy acknowledgement forms, workplace performance evaluations, emergency contacts etc.

- Paid employee benefit information such birth date, sex, beneficiaries, family and marital status etc. relating to applications or changes to health, pension and insurance benefits including medical and dental care, life insurance, disability benefits.
- Financial information of paid employees such as pay cheque deposit information, income tax related information
- Other employee personal information required for the purposes of establishing, managing or terminating an employment or volunteer relationship.

First United will inform employees and volunteers of any new purpose for which we will collect, use or disclose employee personal information, or we will obtain consent before or at the time the information is collected.

In some cases after an employment relationship ends, we will be contacted by other organizations asking to provide a reference. We will not disclose personal information about employees or volunteers to other organizations without express consent.

How do we ensure that personal information is accurate?

We make reasonable efforts to ensure that personal information that we collect, use or disclose is accurate and complete. Individuals may write to First United to correct any errors or omissions in their personal information under our control, or tell us in person. If First United is satisfied that the individual's request is reasonable, we will correct the personal information as soon as is reasonably possible. We will also, as soon as is reasonably possible, send an individual's corrected personal information to each organization to which it was disclosed during the year before it was corrected.

How First United keeps information secure

First United has security arrangements to prevent against risks such as unauthorized access, collection, use, disclosure, copying, modification or disposal of personal information. We use appropriate security measure when destroying personal information including shredding paper records and permanently deleting electronic records. The following security measures will be followed to ensure that member personal information is appropriately protected:

- Locked filing cabinets
- Restricted access to offices
- Need-to-know access, and technological measures including the use of passwords and administrator-controlled access.
- Staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy

How long will First United retain personal information

We will keep personal information used to make a decision that directly affects individuals for at least one year after we make that decision as required under PIPA.

Subject to this one-year retention requirement, we will retain personal information only for as long as necessary to fulfill the identified purposes for which it was collected, or as long as required for a legal or business purpose. For instance, legal advocacy records are retained for up to four years after the last contact with a client, and for up to seven years in cases of full representation. Personal information of donors is retained for as long as a donor does not withdraw consent for First United to contact him or her. Tenant records are retained for at least one year and will be destroyed after that if there is not a business or legal reason to retain them.

Access to records containing personal information

Individuals have a right to access their personal information under our custody or control. A request for access must be made in writing. Individuals may have to prove their identity before gaining access to personal information. First United will provide individuals with personal information under our control, information about how it has been used, and the names of individuals and organizations to which it has been disclosed.

First United may charge a minimal fee for providing an individual with access to his or her personal information. If a fee is required, we will give an estimate in advance of providing the information.

First United will provide requested information within 30 business days after it is requested or will give written notice if we require more time to respond.

In some cases First United may not give an individual access to certain personal information where authorized or required by PIPA to refuse access. Such instances include

- where access would reveal personal information about another individual;
- where disclosure could reasonably be expected to threaten the safety or physical or mental health of another individual;
- where disclosure can reasonably be expected to cause immediate or grave harm to the safety or to the physical or mental health of the individual making the request;
- where disclosure would reveal the identity of an individual who has provided personal information about another individual and the individual providing the personal information does not consent to disclosure of his or her identity.

If First United is able to remove the sensitive information, or personal information about another individual referred to in the above situations from the documents that contain the personal information about the individual who requested it, then First United shall provide the individual with access after it is removed.

If First United refuses an access request, we will state the reasons in writing. Applicants may make a request to the First United privacy officer for an internal review of the decision. Such applicants shall be informed by First United that they have a right to ask the Office of the Information and Privacy Commissioner for British Columbia to review our decision.

Questions and complaints

If individuals have a question or concern about the collection, use or disclosure of personal information by First United, or about a request for access to their own personal information, they should contact the Executive Director. If the individual is not satisfied with the response they may complain to the Office of the Information and Privacy Commissioner of British Columbia.