

# **WEST END – COAL HARBOUR COMMUNITY POLICING CENTRE**

## **Personal Information Protection Policy**

At the West End – Coal Harbour Community Policing Centre (the “**WECHCPC**”), we are committed to providing our staff, volunteers, directors, and members of the public (collectively, our “**People**”) with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our People, protecting their personal information is one of our highest priorities.

While we have always respected our People’s privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia’s *Personal Information Protection Act* (the “**Act**”). The Act sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our People of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy (the “**Policy**”), outlines the principles and practices we will follow in protecting our People’s personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our People’s personal information and allowing our People to request access to, and correction of, their personal information. In the event of any conflict between the provisions in this Policy and the Act, the WECHCPC will ensure to follow the provisions set out in the Act.

### ***Scope of this Policy:***

This Policy applies to the WECHCPC. The WECHCPC will also ensure that any service provider collecting, using or disclosing personal information on behalf of the WECHCPC is provided with a copy of this Policy and that the service provider provides the WECHCPC with written consent that it will abide by the terms in this Policy.

### ***Definitions***

**Contact Information** – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number.

**Employee Personal Information** – means personal information about an individual that is collected, used or disclosed solely for the purposes reasonably required to establish, manage or terminate an employment relationship between the WECHCPC and that individual, but does not include personal information that is not about an individual’s employment.

**Personal Information** – means information about an identifiable individual and includes employee personal information but does not include Contact Information or work product information (as that term is defined in the Act).

**Privacy Officer** – means the individual designated responsibility for ensuring that the WECHCPC complies with the Policy and with the Act.

## **COLLECTING, USING AND DISCLOSING PERSONAL INFORMATION**

- 1.1 The WECHCPC will not collect, use or disclose Personal Information unless an individual gives consent for the collection, use or disclosure of the Personal Information, the Act authorizes the collection, use or disclosure of the Personal Information without the consent of the individual or the Act deems the collection, use or disclosure of the Personal Information to be consented to by the individual.
- 1.2 The WECHCPC shall communicate, either orally or in writing, the purposes for which Personal Information is being collected and the way in which it will be used, before or at the time of collection of the Personal Information from an individual.
- 1.3 The WECHCPC shall limit its collection of Personal Information to the extent necessary to fulfill the following purposes:
  - a. To verify the identity of or to enrol our People, we may collect Contact Information, including, without limitation, a person’s name, home address, and telephone numbers;
  - b. To send out associate membership information, we may collect name, home address, and telephone numbers;
  - c. To input log entry forms, we may collect name, home address, and telephone numbers; and
  - d. To meet regulatory requirements, we will collect all necessary information prescribed by legislation and regulations.

## CONSENT

- 1.4 Our People can provide their consent for the collection, use or disclosure of their Personal Information orally, in writing, by phone, electronically or through an authorized representative. Consent for the collection, use or disclosure of our People's Personal Information will be deemed to have been given where:
- a. at the time the consent is deemed to be given, the purpose would be considered to be obvious to a reasonable person and the individual voluntarily provides the Personal Information to the WECHCPC for that purpose; and
  - b. the WECHCPC has given adequate notice to a person requesting that their Personal Information be used for a particular purpose, the person gives consent to the proposed collection, use or disclosure of his or her Personal Information and the collection, use or disclosure of the Personal Information is reasonable having regard to the sensitivity of the Personal Information in the circumstances.
- 1.5 Unless the collection, use or disclosure of a person's Personal Information is necessary for the WECHCPC to comply with a legal obligation or unless consent of a person is not required by the Act for the collection, use or disclosure of a person's Personal Information, a person may, upon giving reasonable notice to the WECHCPC, withhold or withdraw their consent (an "**Electing Member**") to the collection, use or disclosure of their Personal Information. An Electing Member must provide the Privacy Officer with written confirmation that he or she declines such collection, use or disclosure. Upon receipt of such notice, the WECHCPC must inform an Electing Member of the likely consequences of such an election and may, in the WECHCPC's sole discretion, require that an Electing Member not participate in certain activities or provide certain services which may require the Personal Information of an Electing Member to be collected, used or disclosed by law before an Electing Member can engage in such activities.

## Using and Disclosing Personal Information

- 1.6 The WECHCPC will only use or disclose our People's Personal Information in the manner and for the purposes communicated to our People at the time of collection of the Personal Information in accordance with section 1.1 of this Policy.
- 1.7 The WECHCPC will not use or disclose our People's Personal Information for any additional purposes unless the WECHCPC obtains the consent of our People in connection with such additional purposes in the manner set out in this Policy.

## **Retaining Personal Information**

- 1.8 The WECHCPC will retain the Personal Information of an individual for at least one (1) year after using it if the WECHCPC uses the Personal Information to make a decision that directly affects the individual and so that our People have an opportunity to access and ensure the accuracy of the Personal Information.
- 1.9 Subject to section 1.8 of this Policy, the WECHCPC will retain our People's Personal Information for only as long as necessary to fulfill the purposes for which the Personal Information was collected and as permitted by the Act. For greater certainty, the WECHCPC will destroy documents containing the Personal Information as soon as it is reasonable to assume that the purpose for which the Personal Information was collected is no longer being served by retaining the Personal Information and retention is no longer necessary for legal or business purposes.

## **Accuracy of and Access to Personal Information**

- 1.10 The WECHCPC will make reasonable efforts to ensure that our People's Personal Information is accurate and complete prior to making a decision in relation to a person by relying on the Personal Information or using or disclosing the Personal Information.
- 1.11 Our People may request access to their Personal Information in order to ensure that it is accurate and complete. A request for access must be made to the Privacy Officer in writing by a person and provide sufficient detail to identify the specific Personal Information to be accessed and the corrections to be made. The Privacy Officer will make the requested Personal Information available within 30 business days or will provide a notice of extension to the person requesting the Personal Information if more time is required to gather the Personal Information.
- 1.12 If a request is refused in full or in part by the WECHCPC, the WECHCPC will inform the applicant of the reasons for the refusal, the provisions of the Act which permit such refusal, and that the applicant may ask for a review under section 47 of the Act within 30 days of being notified of the refusal.
- 1.13 The WECHCPC may charge a minimal fee for providing access to the Personal Information provided that the Personal Information is not Employee Personal Information. If an individual is required by the WECHCPC to pay such a fee, the WECHCPC will give the applicant a written estimate of the fee before providing the service and may require the applicant to pay a deposit for all or part of the fee.

## **Securing Personal Information**

- 1.14 The WECHCPC is committed to ensuring the security of the Personal Information of our People and protecting it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. The WECHCPC will regularly review and update this Policy and its policies relating to security of Personal Information to maintain the latest in technology safeguards for protecting our People's Personal Information.
- 1.15 The WECHCPC will undertake the following security measures to protect our People's Personal Information:
- a. the use of locked filing cabinets;
  - b. physically securing offices and implementing Clean Desk rules where Personal Information is held;
  - c. the use of user identification codes, passwords, encryption and firewalls;
  - d. restricting our People's access to the Personal Information only as required and permitted by the Privacy Officer; and
  - e. using shredding equipment or services and deleting electronically stored Personal Information when destroying our People's Personal Information in accordance with section 1.9 of this Policy.

## **Questions and Complaints: The Role of the Privacy Officer**

- 1.16 The Privacy Officer is responsible for ensuring the WECHCPC complies with this Policy and the Act.
- 1.17 Our People should direct any complaints, concerns or questions regarding the WECHCPC's compliance with this Policy and the Act to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, our People may write to the Information and Privacy Commission of British Columbia in the manner set out in the Act.

Contact information for the Privacy Officer:

Executive Director

1267 Davie Street,

Vancouver, BC V6E 1N4

P: 604-717-2924

F: 604-717-2926

info@wehcpc.com