

The Surrey Association for Community Living (SACL) is committed to protecting the privacy of people whose personal information is held by SACL through responsible information management practices. All or any personal information provided to the Surrey Association for Community Living is collected, used and disclosed in accordance with the Freedom of Information and Protection of Privacy Act or other applicable legislation.

Policy Statements:

**Surrey Association for Community Living  
Privacy Statement**

Surrey Association for Community Living is committed to maintaining the security, confidentiality and privacy of your personal information. Our Privacy Policy is in compliance with both Provincial and Federal privacy legislation. For more information please go to our website at [www.commliv.com](http://www.commliv.com) or contact our Privacy Officer at 604-574-7481.

**Surrey Association for Community Living  
Privacy Statement Use of Personal Information**

All personal information supplied will remain within our organization and will not be shared with any external entity unless prior permission is given. Your personal information will not be sold, distributed or published in any manner whatsoever.

**Surrey Association for Community Living  
Website Privacy Statement**

We respect the privacy of every individual who visits our website. We take great measures to ensure the privacy and confidentiality of any personal information on this site. For further information please refer to our privacy policy at [www.commliv.com](http://www.commliv.com)

**Surrey Association for Community Living  
Email/Facsimile Privacy Statement**

The information in this email/facsimile may be confidential and/or privileged. This email/facsimile is intended to be reviewed by only the individual or organization named. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email/facsimile and its attachments, if any, or the information contained herein is strictly prohibited. If you have received this email/facsimile in error, please immediately notify the sender by return email and delete this email from your system.

### Employee Confidentiality:

Upon employment, every employee of Surrey Association for Community Living is required to sign a "Confidentiality Agreement and Code of Ethics" that ensures the confidential handling of information and material. This agreement demonstrates our commitment, both collectively and as individuals, to protecting the confidentiality of information held by the Association and including the delivery of services and programs to the people we serve. This is applicable to members and volunteers.

### Federal & Provincial Compliance:

The Surrey Association for Community Living complies with the federal Personal Information & Electronic Document Act [http://www.privcom.gc.ca/legislation/index\\_e.asp](http://www.privcom.gc.ca/legislation/index_e.asp) and the provincial Personal Policy Information Act [http://www.msar.gov.bc.ca/FOI\\_POP/Privacy/default.htm](http://www.msar.gov.bc.ca/FOI_POP/Privacy/default.htm).

### Contact Us:

Should you have any questions or concerns please do not hesitate to contact us either by mail or facsimile.

Privacy Officer  
Surrey Association for Community Living  
Address: 17687-56A Avenue, Surrey, BC, V3S 1G4  
Fax: 604-574-7431  
Email: [privacyofficer@commliv.com](mailto:privacyofficer@commliv.com)

## **POLICY BACKGROUND**

### What is Personal Information?

Personal information is recorded information about an identifiable individual. Personal information includes such things as an individual's name, address, birth date, e-mail address and phone number. When the Surrey Association for Community Living collects personal information it identifies:

- the purpose for collecting the personal information,
- the legal authority for collecting it, and
- the titles, addresses and telephone numbers of members, volunteers and employees of the Association.

### What safeguards are in place?

The Surrey Association for Community Living is obligated to protect your personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal. Measures have been integrated, implementation and day-to-day operating practices as part of SACL's effort to protection of personal information it possesses.

### How long is information retained?

The length of retention will vary in relation to the nature of the information (appropriate legislation will apply pending the information). If the Surrey Association for Community Living uses your personal information as a resume to make a decision that directly affects you, the information will be retained for at least one year.

## FEDERAL PRIVACY

### Ten Principals of Privacy

The purpose of the Personal Information Protection and Electronic Documents Act is to provide Canadians with a right of privacy with respect to their personal information that is collected, used or disclosed by an organization in the private sector in an era in which technology increasingly facilitates the collection and free flow of information.

The code's 10 principles are:

1. **Accountability:** An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.
2. **Identifying Purposes:** The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.
3. **Consent:** The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except when inappropriate.
4. **Limiting Collection:** The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.
5. **Limiting Use, Disclosure, and Retention:** Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by the law. Personal information shall be retained only as long as necessary for fulfillment of those purposes.
6. **Accuracy:** Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
7. **Safeguards:** Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.
8. **Openness:** An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.
9. **Individual Access:** Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

10. Challenging Compliance:

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals for the organization's compliance.

BC PRIVACY

The purpose of the Personal Information Protection Act is to govern the collection, use and disclosure of personal information by organizations in a manner that recognizes both the right of individuals to protect their personal information and the need of organizations to collect, use or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances.

Privacy Officer: Appointment of Personnel by organization to specifically address matters of confidentiality.

Collection Audit: Personal Information such as Name, age, height, home address, phone number, race, ethnic origin, sexual orientation, employment information, income, purchases and spending habits.

Complaint Process: A Privacy Complaint Form must be requested and completed by the person who has recognized or experienced a problem. The Complaint Form will be forwarded to the Association Privacy Officer to investigate the claim. The complaint must be investigated within 21 days of the time of the complaint received by the Association Privacy Officer. A decision must be made within 7 days after the complaint has been investigated.

Should a complaint be forwarded to Management of breach of confidentiality, the organization policies and procedures test the breach and depending on the matter, progressive disciplinary process is engaged.

Policy: All staff, members and volunteers at the Association comply with the policy and procedures pertaining to Confidentiality and Privacy.

Training: The Association makes education and sharing of information among staff, volunteers and members available. Regular staff meetings are a forum to discuss and share information on privacy and confidentiality.

Follow: Surrey Associations for Community Living respects the rights of employees, members, and staff as outlined in the Personal Information Privacy Act. The Association is committed to follow up any genuine concerns raised by individuals.

AUDIT FEDERAL PRIVACY  
Ten Principals of Privacy

Accountability: Privacy Officer – Satvinder Basran

Identifying Purposes: As personal information is gathered it is clearly explained on what purposes the information is gathered and utilized.

Collected from Staff for employment and benefit purposes

- Program and Services Participants & Residents
- Volunteers
- Members

Consent: We require consent on any use of personal information – Payroll, Benefits, Ministry, Health & Safety, WCB and others

Limiting Collection: Open disclosure is made on behalf of the Association upon collection of personal information and the use of the information. Limiting Use,

Disclosure and Retention:

All personal information is respected and treated with complete confidence. All personal information must receive consent from the individual, and it is explained to the individual the purpose of the information.

Personal information is retained only as long as it is necessary to fulfill its intent of purpose.

Accuracy: Personal information shall be accurate and up to date as possible for the purpose it is intended.

Safeguards: Personal information is secured on site and in files to prevent the breach of confidence and misuse of information. Computers – passwords, filing cabinets – keyed..etc.

Openness: SACL Confidentiality policies and procedures.

Individual Access: As stated in the collective agreement, access is open for staff and employees to their personal file.  
Members and volunteers can also make a request.

Challenging Compliance:

Questions and concerns regarding confidentiality and privacy can be forwarded to the Privacy Officer.

## BC AUDIT

Privacy Officer: Satvinder Basran  
Human Resources & Labour Relations Coordinator

### Collection Audit:

#### Human Resources & Labour Relations

- Interviews – consent for references – holding resumes for one year on file, shred resume beyond this period.
- Information forwarded by a potential employee to be treated with complete confidence unless there is a legal obligation.
- Criminal Record Check conducted by HRLR – Response is forwarded (unopened) directly to HRLR – Information is recorded on HRLR computer in a separate file for documentation purposes (computer is protected by passwords). The original Criminal Record Check (CPIC) is returned to the person and only a copy of a generic letter is on their file as a record. CPIC's that require further information are stored in HRLR filing cabinet under lock and key.
- Personal files are under lock and key. Access is for Coordinators, Secretary (file sorting & updating) and Supervisory Staff for interviewing purposes only.
- Only HRLR and Coordinators do photocopying of Personal information on files.
- All health & benefits records are in HRLR filing cabinet under lock and key.
- Telephone calls requesting personal information on employees are not permitted. Caller is instructed to fax the request and then it is treated with due diligence on how to respond. If Caller is trying to contact the employee, the receptionist takes the Callers number and passes the message to the employee.
- Any and all personal information is treated in confidence. Policies and procedures on confidentiality in our departments clarify the treatment of materials internally regarding staff, participants, residents, volunteers, members and others.
- The collective agreement also contains information on the treatment of sensitive information.
- Sign In & Sign Out Book with numbered pages to track personel a good practice to implement for senior staff.
- Utilization of personal interagency file folds to be used by departments to exchange information would be a good practice.

#### Volunteers Services

- Liaison for Volunteer Services stores all information on volunteers and members.
- Acknowledgement of Criminal Record Checks for volunteers is reviewed by HRLR. The Criminal Record Check is returned to the volunteer and only a copy of the letter is forwarded to the Liaison for Volunteer Services. CPIC's that require further information are stored in HRLR filing cabinet under lock and key.
- Request a small lock and key to be added to desk to protect files.

### Payroll Services

- All information is strictly used for payroll and benefit coverage matters. No personal staff information is released.
- Payroll office contains may files that could be placed in the back storage file room. However, old files need to be removed first to place current files for storage.
- Old files currently in the filing room to be cleaned up and to lock up room, concerns over security.

### Administrative Support Services

- Recommended that senior staff that access files must contact Administrative Assistant. This is for accountability and confidentiality purposes.
- Concern regarding storage file room regarding safety in the room for staff.

### Reception Services

- Canvassing personal telephone calls and messages
- Processing Mail, handling sensitive mail such as CPIC's for HRLR & Family Services.
- Updating Filing on Personal Files.
- Forwarding sensitive faxes to staff.

Policy: All members, staff and volunteers at the Association comply with the policy and procedures pertaining to Confidentiality and Privacy.

Training: Education and sharing of information at monthly staff meetings, supervisor meetings and team building is where a majority of staff training occurs. Matters concerning confidentiality and privacy are presented at the time of employment and fostered throughout employment. This is very prevalent in our vocational, family and residential services where participants and staff are cognizant of the need to respect privacy and confidentiality.  
Information shared at the Board level and senior staff level on confidentiality.

Follow: We will continue to build and enhance our polices and procedures on the collection of information and respect the rights of employees, volunteers, and members as outlined in the Personal Information Privacy & Electronic Document Act.

### TERMS OF REFERENCE:

SACL	Surrey Association for Community Living or the Association
Staff	An individual hired as an employee by the Surrey Association for Community Living.
Volunteer	An individual that volunteers their time and resources with the Surrey Association for Community Living. Example, student, Board Member, others...
Member	An individual that is a non-active member of the Surrey Association for Community Living.
PIPEDA	Personal Information Protection and Electronic Documents Act
PIPA	Personal Information Protection Act

*POLICY: PRIVACY COMPLAINT PROCESS*

Policy Statements:

SACL is committed to ensuring that personal information collected from individuals, family members, staff and volunteers is appropriately protected and that privacy is respected.

**PURPOSE:** Should there be a concern arising Privacy, a party or parties have the right to forward a complaint.

**PROCEDURE:**

Should a complaint be forwarded to Management of breach of confidentiality, the organization policies and procedures test the breach and depending on the matter, progressive disciplinary process is engaged.

A Privacy Complaint Process will be implemented.

The individual with concern or complaint must write to the Privacy Officer to either forward concern or to request for the Complaint Form. The Privacy Officer will forward an assigned Complaint Form to the individual. The individual has seven days to respond.

The Complaint Form will be forwarded to the Association Privacy Officer to investigate the claim. The complaint must be investigated within 21 days of the time of the complaint received by the Association Privacy Officer. A decision must be made within 7 days after the complaint has been investigated. The decision will be forwarded to the individual who has launched the complaint.

Should the individual not agree, they have the option to appeal the decision to the federal or provincial privacy officer for mediation or review of decision.

**FORM:** Complaint Form

**CONTACT INFORMATION:**

Should you have any questions or concerns please do not hesitate to contact us either by mail or facsimile.

Privacy Officer  
Surrey Association for Community Living  
Address: 17687-56A Avenue, Surrey, BC, V3S 1G4  
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