

The Gospel Chapel

Privacy Policy and Procedures

Revised March 2007

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THE GOSPEL CHAPEL PRIVACY POLICY

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The Gospel Chapel Privacy Policy and Procedures

COLLECTION AND RETENTION OF PERSONAL INFORMATION

Members, regular attendees & visitors

- The Gospel Chapel collects and uses Personal Information in order to serve its members, regular attendees and visitors. The primary purpose for collecting information is to maintain membership lists, produce the church directory, provide pastoral care, record baptisms and marriages, distribute newsletters, and to contact program participants.
- Unless required otherwise by law (e.g. marriages) inactive files will be retained for a maximum of 5 years.

Children/Youth Program Participants

The primary purpose for collecting Personal Information is to minister to children and youth effectively, provide appropriate pastoral care, keep them safe and provide emergency medical assistance. Contact information for the family is primarily for use in the event of an emergency, but may also be used by the Ministry Workers for the purposes for program activities.

Employees

- The primary purpose for collecting Personal Information is to complete payroll, communicate with employees and maintain the employee relationship. A further purpose is to fulfill the Society's legal requirements with regard to its employees.
 - Employee files will be kept for 7 years after employment ends. Payroll data, which constitutes a part of the permanent financial record of the Society, will be kept for the life of the organization.
 - Supervisors, the Senior Pastor, the Leadership Team Chairperson, and the Ministry Team Chairperson may provide references for former employees. References will only be given upon request by the former employee. References are not provided for former employees after five years have elapsed from the time of their employment.
 - Resumes, applications and interview notes with respect to candidates who are not hired are kept for a maximum of 12 months from receipt, after which time they are destroyed.
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Contract Employees

- The primary purpose for collecting Personal Information for those who provide contract services (e.g. custodian) is for work-related communications and potential contact for future assignments.
- In almost all cases, unless required by the terms of the contract, this information is limited to contact information only. Where additional information has been collected, this will be retained in accordance with policies on employee files.

Board Members

- The primary purpose for collecting information is to allow for communication and the distribution of relevant information that allows them to fulfill their responsibilities as Leadership Team and Ministry Team Members.
- The secondary purpose for collecting information is to allow the Society to fulfill its legal reporting requirements and contractual agreements. These purposes include the Society's Return to the Province of BC, Charity Information Return T3010A, insurance carrier for Directors' and Officers' liability insurance.
- Personal Information about former Leadership Team and Ministry Team Members, other than that which must be retained to fulfill the Society's legal requirements, will be destroyed after 5 years.

Volunteers

- The primary purpose for collecting Personal Information is to allow for placement, communication and volunteer recognition.
- Contact information for a family member or friend is also collected in case of an emergency.
- After a volunteer leaves, Personal Information will be kept indefinitely if they have been working with children or youth. Other volunteer's information will be kept for 3 years.

Donors

- Personal Information from donors is collected for the purpose of issuing tax receipts. All information regarding a donor will be kept confidential to the greatest extent possible. Donor lists will not be shared with third parties or sold.
 - Lists of donors may be kept indefinitely, except where the donor specifically requests that their Personal Information be destroyed.
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Photographs

- Photographs and images that promote the church are used in a variety of media which may include a church web site, brochures, displays, annual reports and other promotional materials.
- The Gospel Chapel will obtain a Photo Waiver from any individual whose photograph or image will be used in promotional material.
- Photographs will be kept indefinitely unless the individual, or one of the individuals in a photograph, requests that their image no longer be used. Upon such a request, the photograph or image will be removed from the promotional media as soon as is reasonably possible.
- As photographs form a part of the Church's historic and archival records, photographs will not generally be destroyed when an individual requests that their image be withdrawn from promotional use.

Contractors

- Personal Information collected and used by our contractors will meet or exceed the Society's standards and policies.
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SECURITY OF PERSONAL INFORMATION

Appropriate security safeguards are in place to protect Personal Information that is held by the Church.

Computer Data

- All staff and in-house volunteer workstations are password protected.
- Access is restricted to only those individuals whose work relates directly to the files.
- In addition to passwords for workstation access, sensitive software programs such as the Church's accounting program are also password protected. Access is restricted to only those staff whose work relates directly to the program.
- Electronic equipment is under supervision, secured or in a restricted area at all times.

Paper Files

- All filing cabinets, desk drawers and other storage devices for paper files containing Personal Information are under supervision, secured in a restricted area or locked at all times.
- Access to sensitive files is restricted to relevant employees and/or volunteers who need the information in order to carry out their work.
- With regard to employee information, employee files may only be accessed by the employee's supervisor, the Senior Pastor, and the Leadership Team Chairperson.

DESTRUCTION OF PERSONAL INFORMATION

When Personal Information is no longer required for the purpose for which it was collected, the information will be destroyed, erased or otherwise made anonymous.

Paper Files

Paper files will be destroyed by shredding. Shredding will be carried out in a secure area and by appropriate personnel.

Electronic Files

Electronic files will be destroyed by deletion. When computer hardware is discarded, the Church will ensure that hard drives are reformatted to erase any information contained on this media.

PRIVACY OFFICER

The Leadership Team Chairperson or their designate is responsible for the Society's privacy compliance. As the Privacy Officer, the individual's name will be made available to members of the public. The Privacy Officer will ensure that:

- Information protection policies are established and updated
- Sensitive information is protected and accessibility properly controlled
- Employees are educated as to the importance of information protection
- Enquiries and requests are addressed expediently and thoroughly
- Privacy complaints are resolved efficiently with the goal of satisfying all individuals involved

COMPLAINTS PROCESS

The Privacy Officer will be responsible for receiving and responding to any complaints regarding The Gospel Chapel's compliance with the Act.

Communication with Staff

- The procedures for handling complaints will be communicated to all staff upon their employment with The Gospel Chapel.
- Procedures will be reviewed when any changes are made.

Complaints must be in writing

- Complaints regarding The Gospel Chapel's compliance with the Act must be received in writing and signed by the complainant.
- In cases where this would be prohibitive due to language or other barrier, an initial complaint may be provided verbally.
- As it is important to the investigation to have the complaint written up and signed by the complainant as to its accuracy, formal documentation is required prior to conducting an investigation.

Making a complaint

Upon request, staff will inform an individual of the procedure for making a complaint. This information will include:

- The requirement that complaints be received in writing and signed
 - The name of the Privacy Officer to whom the complaint should be addressed
 - When and how the Privacy Officer will contact the complainant
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Handling the Complaint Process

When a complaint is received:

- It will be forwarded immediately to the Privacy Officer
- The date that the complaint was received will be recorded
- Receipt of the complaint will be acknowledged promptly and in writing
- The Privacy Officer will respond to all complaints within 30 working days
- All complaints will be investigated in a fair and impartial manner
- The Privacy Officer may contact the complainant to clarify the complaint
- The Privacy Officer will endeavour to achieve a mutually satisfactory resolution
- The complainant will be notified in writing of the outcome of the investigation
- Policies and procedures may be modified based on the outcome of the investigation

Failure to resolve the complaint

- In the event that the Privacy Officer is unable to resolve the complaint to the satisfaction of all parties within a reasonable period of time, the complainant will be informed of his/her right to recourse with the Information and Privacy Commissioner.
- The Office of the Information and Privacy Commissioner can be reached at:
3rd Floor, 756 Fort Street, Victoria, BC V8W 9A4.
Ph: 387-5629 Email: OIPC@gems5.gov.bc.ca