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## NORTH KOOTENAY LAKE COMMUNITY SERVICES SOCIETY

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**POLICIES AND PROCEDURES**

**POLICY TITLE: Privacy**

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**POLICY GROUP: Client Rights**

**POLICY: Heading 2**

**STANDARDS: Heading 2**

**EMPLOYEE GROUP: All Personnel**

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**POLICY:**

NKLCSS respects and upholds an individual's right to privacy and to protection of his or her personal information. NKLCSS is committed to collecting, using, disclosing and retaining personal information in a manner that complies with applicable privacy legislation.

NKLCSS sets out the procedures that will be observed with respect to the collection, use, disclosure and retention of information about any identifiable individual who is a past, current or prospective:

- child
- client
- member
- employee
- volunteer
- donor

of NKLCSS.

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**PROCEDURE:**

**1. Accountability**

NKLCSS is responsible for all personal information under its control. The organization's Privacy Officer(s) is/are accountable for NKLCSS's compliance with the principles described in this policy. The Privacy Officer(s) can be contacted at NKLCSS.

NKLCSS is responsible, not only for personal information in its physical custody, but also for personal information that is transferred by NKLCSS to a third party and will implement procedures to:

- protect personal information
  - receive and respond to complaints and inquiries
  - orient employees and volunteers in the policies and procedures regarding the collection use, disclosure and retention of personal information under
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NKLCSS's protection

- ensure all members, clients, employees and volunteers have access to NKLCSS's Privacy Policy and Procedures

## **2. Purposes for Collection, Use, and Disclosure**

Personal information will be collected on a "need to know" basis for the operation of NKLCSS.

NKLCSS may collect personal information concerning children, clients, members, employees, volunteers and/or donors for the following purposes:

to comply with legal and regulatory requirements

- to operate NKLCSS
- to administer and maintain accounts relating to operations and/or donations.

## **3. Consent**

Consent of the individual is required for the collection, use and/or disclosure of personal information by NKLCSS, except where inappropriate by law or by circumstance. Implied consent may arise through action or inaction on the part of the individual.

## **4. Limiting Collection**

NKLCSS will limit the amount and type of personal information collected to information that is necessary for the purposes of NKLCSS.

## **5. Limiting Use, Disclosure and Retention**

NKLCSS will not use or disclose personal information for purposes other than those for which it was collected, except with the written consent of the individual or as required or permitted by law. Personal information will be retained only as long as necessary for the fulfillment of legal or business purposes. Personal information will be stored in a locked cabinet at NKLCSS and will be accessed on a "need to know" basis.

## **6. Accuracy**

NKLCSS will make a reasonable effort to ensure that personal information collected by NKLCSS or on its behalf is as accurate and complete as is necessary for the purposes for which it is to be used. NKLCSS will generally rely on individuals to provide updated information, such as changes to addresses and other contact information.

## **7. Safeguards**

NKLCSS will make reasonable security arrangement to protect personal information. Safeguard arrangements are employed to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, modification, or

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disposal. The methods of protection employed by NKLCSS will include:  
physical measures, including locked filing cabinets and restricted access to offices;

- organizational measures such as “clean desk” policy and limiting access to a “need to know” basis;
- technological measures, such as use of passwords to access electronic files.

## **8. Openness**

NKLCSS will ensure that individuals are able to acquire information about NKLCSS’s policies and procedures on privacy protection. NKLCSS will make this information available in a form that is generally understandable.

## **9. Accessing Personal Information**

When requested in writing to the privacy officer, NKLCSS shall inform an individual of the existence, use and disclosure of his/her personal information and the individual shall be given access to that information, except where the law requires or permits NKLCSS to deny access. NKLCSS will respond to requests in writing as accurately and completely as is reasonably possible within 30 days after receipt of the request.

## **10. Complaints**

An individual will be able to direct complaints concerning NKLCSS’s compliance with privacy protection to the Privacy Officer(s). A complaint must be in writing to the Privacy Officer(s). NKLCSS will:

1. promptly acknowledge receipt of the complaint in writing
2. contact the individual to clarify the complaint, if necessary
3. investigate all complaints received
4. notify the individual of the outcome of investigations promptly, informing them clearly of any relevant steps taken
5. correct any inaccurate personal information or modify policies and procedures based on the outcome of complaints
6. make reasonable efforts to process complaints within 30 days or apply to the Privacy Commissioner for an extension.

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