

**BC Association for Individualize Technology
and Supports for People with Disabilities (BCITS)
PRIVACY POLICY**

POLICY

BC Association for Individualize Technology and Supports for People with Disabilities (BCITS) respects and upholds an individual's right to privacy and protection of his or her personal information. BCITS is committed to ensuring compliance with applicable privacy legislation, including the *Personal Information Protection Act (British Columbia)* and the *Freedom of Information and Protection of Privacy Act (Canada)*.

Any individual's information collected by BCITS is never shared with or sold to any third party, except in aggregate form that does not allow for the identification of any individual's personal information.

Our clear mandate is to inform people what personal information is collected and for what purposes, to store the information securely, to identify who has access to that information and to inform people what information will be shared and in what circumstances.

Definition – personal information

“Personal Information” is recorded information about an identifiable individual, and may include but is not limited to:

- Name and address, contact information including phone number
- Nationality, spoken languages, citizenship, race, ethnic origin, religious beliefs
- Age, sex, sexual orientation, marital status, or family status
- Legal identification or identifying numbers, including birth certificate, BC ID, SIN, PHN, etc.
- Photographs
- Any inheritable characteristics, including blood type
- Health care history and medications, physical or mental disability
- Educational, financial, criminal and employment and volunteer history
- Current and previous assessments, observations and opinions, including both formal and informal information
- Personal views or opinions of individuals
- Individual habits, likes and dislikes, the names of friends and family and information about people with whom any individual client may have relationships with, including caregivers.
- Legal documents, including custody orders, restraining orders, representation agreements and powers of attorney

BCITS shall make this policy available to the public via its website.

Accountability

BCITS is accountable for personal employee, volunteer, board members, donors, caller, and organizational/agency information under its control. BCITS has appointed its Client Services and IT Manager to be its Privacy Officer, who is responsible for its compliance under this Policy.

Purposes for Collection, Use, and Disclosure

BCITS collects and uses personal information about. BCITS collects and maintains personal information on six major groups of people:

- People we serve (clients)
- Employees,
- Volunteers,
- Members,
- Donors, and
- Board Members

BCITS only collects and maintains personal information that is required for its operation. These specific purposes include:

Members: Demographic information and annual membership payment details are collected and updated for our members so that BCITS can manage our renewal and magazine subscription services. We also record whether a member has a spinal cord injury, other physical disability or no disability. This allows us to direct mailings on disability-specific information, which may come from an external source but are managed by BCITS to protect our members' privacy.

Employees: Demographic and other personal information regarding BCITS employees is collected for payroll and benefit administration. These records, along with personnel files that contain human resources information, are kept in a very secure manner and access is restricted to appropriate members of the finance and management groups.

Volunteers: Demographic and other personal information regarding BCITS volunteers is collected and kept as a point of reference for the association to be able to contact volunteers to represent and support BCITS at special events, fundraising and administrative duties. The contact information is kept in a secure manner and access is restricted to appropriate employees who use the volunteers for support.

Clients: Demographic and other personal information is collected about clients, their families and related third parties. This information is gathered and used only after informed consent from the client is obtained. We collect this information in order to determine eligibility for funding, for research purposes, and to better serve the needs of our clients.

Donors: Demographic and donation information is collected and updated for our donors so that BCITS can issue tax receipts. We also use this information to keep donors updated on special events and the fund raising needs of the organization. These records and other personal information collected from donors allow the organization to build relationships with donors and increase support through recognition and communications programs.

Board Members: As part of the nomination process to the Board, contact and biographical information is submitted by each prospective board member. BCITS provides this information to the membership once the members have been elected to the Board and maintains it over the duration of their tenure.

Consent

BCITS will inform people what information is being collected, how it will be collected and for what purposes. BCITS will obtain consent for the collection, maintenance or sharing of material. BCITS will make reasonable efforts to ensure that information is not divulged to any third party without the express prior written consent of the individual named. BCITS may disclose personal information in exceptional circumstances, e.g., when personal information is used for an emergency that may threaten an individual's life, health, or personal security.

Limit for Collecting Personal Information

BCITS will only collect personal information for the purposes identified. BCITS will use methods that are lawful and will not collect information indiscriminately. The retention of personal information differs with each major group of people we collect information from. Once the appropriate time period has been surpassed, paper files are shredded and electronic files are deleted.

Limits for Use, Disclosure, and Keeping of Personal Information

Personal information will only be used or disclosed for the purposes for which it is collected. BCITS will not use personal information for additional purposes without securing consent to do so from the person(s) to whom the information pertains, or as required by law.

BCITS may give aggregate information to third parties (such as funding organizations/agencies that contract with BCITS to provide services to callers), but not in a manner that would allow for identification of any particular individual.

BCITS will ensure appropriate security undertakings, such as confidentiality clauses in contractual agreements, are employed to protect the transfer and use of personal information.

BCITS will retain information only as long as it is necessary for the identified purposes, or as required by law.

Accuracy

BCITS will make reasonable efforts to ensure that personal information is accurate, complete, and current as required for the purpose for which information was collected. In some cases, BCITS relies on its staff members to ensure that information, such as their addresses or telephone numbers, is current, complete, and accurate.

Safeguards

BCITS is committed to the safekeeping of personal information in order to prevent its loss, theft, unauthorized access, disclosure, duplication, use, or modification.

BCITS protects personal information with appropriate security safeguards. Safeguards include physical, administrative, and electronic security measures.

Availability of Policies and Procedures

BCITS is open about the policies and procedures used to protect personal information. Information about policies and procedures is available upon request.

Providing Access to Personal Information

You have the right to access your personal information which is held under the control of BCITS, with some exceptions. The Privacy Officer will assist you with your access requests. In certain exceptional situations, BCITS may opt not to provide access to information it holds about you. If access to certain information cannot be provided, BCITS will notify you, in writing, of the reasons for the denial of access.

All requests for personal information, including release of the contents of a call made to BCITS, must be made in writing directly to the Privacy Officer. If the contents of the call are still available, the Privacy Officer will endeavour to make the contents of the call available as a written transcript, omitting the name of the call taker in order to protect his/her privacy.

Concerns or Questions Regarding BCITS' Compliance

You may direct your questions regarding BCITS's compliance with this policy to its Privacy Officer at: BCITS, 103-366 East Kent Ave. South, Vancouver, BC V5X 4N6, or email info@bcits.org

Privacy Complaints Handling Procedure

1. Complainants should contact BCITS' Privacy Officer directly.
2. Complainants may initially approach the Privacy Officer in person or via telephone. All formal complaints must then be submitted to the Privacy Officer in writing.
3. The Privacy Officer will acknowledge all complaints in writing within 5 business days of receipt of the written complaint. The acknowledgment will inform the complainant of the expected time frame for a formal response by BCITS. A formal response will be provided to the complainant, in writing, no later than 30 calendar days after receipt of the complaint by the Privacy Officer.
4. If the complainant is not satisfied with the response from the Privacy Officer, the complainant may approach BCITS' Board of Directors, via the Chair of the Board, in writing. Within 30 days of receipt of the complaint, the Chair will inform the complainant, in writing, of the expected timeframe for disposition of the complaint. Disposition of the complaint may need to wait until the next regularly-scheduled Board meeting. Once the Board has made a decision about the complaint, the Chair of the Board will communicate the Board's decision, in writing, to the complainant within 5 business days.
5. If the complainant is still not satisfied with the disposition of the complaint, the complainant may contact the Office of the Information and Privacy Commissioner of British Columbia for further assistance.