

BC211 POLICIES AND PROCEDURES

SECTION TWO: PRIVACY POLICY

POLICIES

211 British Columbia Services Society (BC211) respects and upholds an individual's right to privacy and protection of his or her personal information. BC211 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)*.

In order to protect caller privacy, BC211 does not subscribe to call display on any of its phone lines.

No personal information, other than a caller's community, is recorded in any of BC211's electronic call records.

Any individual's information collected by BC211 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.

BC211 staff do not ask callers for their name, phone number, or any other identifying information, except as outlined below.

BC211 shall make this policy available to the public via its website.

Accountability

BC211 is accountable for personal employee, volunteer, caller, and organizational/agency information under its control. BC211 has appointed its Executive Director to be its Privacy Officer, who is responsible for its compliance under this Policy.

Purposes for Collection, Use, and Disclosure

BC211 collects and uses personal information about:

1. Employees for the following purposes:
 - a. For the administration and management of matters relating to paid employees and the administration of the collective agreement
 - b. For the administration of payroll and benefits
 - c. To meet statutory Provincial and Federal requirements
2. Volunteers for the following purpose:
 - a. For the administration and management of matters relating to volunteers
3. Callers for the following purposes:
 - a. For providing information and referrals that are appropriate to a caller's unique situation (age range, gender, community)
 - b. For providing follow-up assistance to callers who could possibly benefit from a return phone call. Callers who decline a follow-up do not have any personal information recorded; callers who accept a follow-up have their name and telephone number recorded in order to allow BC211 staff to return their phone call

- c. For providing an Assisted Referral. Callers who decline an Assisted Referral do not have any personal information recorded; callers who accept an Assisted Referral have their name and telephone number recorded and passed along directly to the service provider.
- d. For training and quality assurance purposes. Calls are recorded and retained for two weeks in order to facilitate ongoing training of Information & Referral Specialists and assure that BC211's services are meeting quality benchmarks.

Consent

BC211 will make reasonable efforts to ensure that staff and volunteer information is not divulged to any third party without the express prior written consent of the individual named. BC211 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.

Callers are advised that their call to BC211 will be recorded. Callers who do not consent to having their call recorded may inform the Information & Referral Specialist who will ensure that the call is not recorded.

Only callers who consent to a follow-up or assisted referral will have their information recorded; callers who do not consent will not have their information recorded.

Limit for Collecting Personal Information

BC211 will only collect personal information for the purposes identified. BC211 will use methods that are lawful and will not collect information indiscriminately.

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. BC211 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.

BC211 may give aggregate information to third parties (such as funding organizations/agencies that contract with BC211 to provide services to callers), but not in a manner that would allow for identification of any particular individual.

BC211 will ensure appropriate security undertakings, such as confidentiality clauses in contractual agreements, are employed to protect the transfer and use of personal information.

BC211 will retain information only as long as it is necessary for the identified purposes, or as required by law.

Accuracy

BC211 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, BC211 relies on its staff members to ensure that information, such as their addresses or telephone numbers, is current, complete, and accurate.

Safeguards

BC211 is committed to the safekeeping of personal information in order to prevent its loss, theft, unauthorized access, disclosure, duplication, use, or modification.

BC211 protects personal information with appropriate security safeguards. Safeguards include physical, administrative, and electronic security measures.

Availability of Policies and Procedures

BC211 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 BC211, with some exceptions. The Privacy Officer will assist you with your access requests. In certain exceptional situations, BC211 may opt not to provide access to information it holds about you. If access to certain information cannot be provided, BC211 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 BC211, must be made in writing directly to the Executive Director. If the contents of the call are still available, the Executive Director 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 BC211's Compliance

You may direct your questions regarding BC211's compliance with this policy to its Privacy Officer at: BC211, 330-111 West Hastings Street, Vancouver, BC V6B 1H4, or email info@bc211.ca.

1. Privacy Complaints Handling Procedure

Effective Date: June 12, 2012

PROCEDURE

1. Complainants should contact BC211's 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 BC211. 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 BC211's 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.