



## **Personal Information Protection Policy**

At Bethany Child Care Centre we are committed to providing our families with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our families and children, protecting their personal information is one of our highest priorities.

While we have always respected our families' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our families of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting families' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our families' personal information and allowing our families to request access to, and correction of, their personal information.

### **Definitions**

**Personal Information** – means information about an identifiable individual. E.g., including name, age, home address and phone number, medical information, employment information. Personal information does not include contact information (described below).

**Contact information** – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

**Privacy Officer** – means the individual designated responsibility for ensuring that Bethany Child Care Centre complies with this policy and PIPA.



## **Policy 1 – Collecting Personal Information**

- 1.1 Unless the purposes for collecting personal information are obvious and the families voluntarily provide their personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect family information that is necessary to fulfill the following purposes:
  - To verify identity; *we may collect name, home address, home telephone number and birth date;*
  - To open and manage an account;
  - To deliver requested services
  - To provide medical services;
  - To enroll your child in a program;
  - To use membership information;
  - To contact our families for fundraising;
  - To ensure a high standard of service to our families;
  - To meet regulatory requirements;
  - To collect and process payments;

## **Policy 2 – Consent**

- 2.1 We will obtain the families' consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally, in writing, electronically, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the families voluntarily provide personal information for that purpose.
- 2.3 Consent may also be implied where a family is given notice and a reasonable opportunity to opt-out of their personal information being used for mail-outs, and fundraising and the family does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the child care service, or the withdrawal of consent would frustrate the performance of a legal obligation), families can withhold or withdraw their consent for Bethany Child Care Centre to use their personal information in certain ways. A family's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service. If so, we will explain the situation to assist the families in making the decision.
- 2.5 We may collect, use or disclose personal information without the family's knowledge or consent in the following limited circumstances:
  - When the collection, use or disclosure of personal information is permitted or required by law;
  - In an emergency that threatens an individual's life, health, or personal security;



- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law

### **Policy 3 – Using and Disclosing Personal Information**

- 3.1 We will only use or disclose families' personal information where necessary to fulfill the purposes identified at the time of collection *such as*:
- To conduct family surveys in order to enhance the provision of our services;
  - To contact our families directly about services that may be of interest;
- 3.2 We will not use or disclose families' personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell our family lists or personal information to other parties.

### **Policy 4 – Retaining Personal Information**

- 4.1 If we use families' personal information to make a decision that directly affects the families, we will retain that personal information for at least one year so that the families have a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain families' personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

### **Policy 5 – Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that families' personal information is accurate and complete where it may be used to make a decision about the families or disclosed to another organization.
- 5.2 Families may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the families' correction request in the file.



## **Policy 6 – Securing Personal Information**

- 6.1 We are committed to ensuring the security of families' personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that families' personal information is appropriately protected:
- the use of locked filing cabinets;
  - physically securing offices where personal information is held;
  - the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate
- 6.3 We will use appropriate security measures when destroying families' personal information such as:
- *shredding documents*
  - *deleting electronically stored information*
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## **Policy 7 – Providing Families Access to Personal Information**

- 7.1 Our families have a right to access their personal information, subject to limited exceptions:
- solicitor-client privilege,
  - disclosure which would reveal personal information about another individual,
  - health and safety concerns
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell families how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the families of the cost and request further direction from the families on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the families in writing, providing the reasons for refusal and the recourse available to the families.



## **Policy 8 – Questions and Complaints: The Role of the Privacy Officer**

- 8.1 The Privacy Officer is responsible for ensuring Bethany Child Care Centre’s compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Families should direct any complaints, concerns or questions regarding Bethany Child Care Centre’s compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the families may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Bethany Child Care Centre’s Privacy Officer:

Mrs. Valerie Coyle  
Email: [valeriejcoyle@hotmail.com](mailto:valeriejcoyle@hotmail.com)  
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