

**THE CRIDGE CENTRE FOR THE FAMILY  
POLICY MANUAL**



**SECTION:** EMPLOYMENT POLICIES  
**NUMBER:** 2.9 – Privacy Statement  
**DATE APPROVED:** August, 2004      **LAST REVISED DATE:** March 2022  
**RELATES TO:** Imagine Canada Standard A13 and Board Policy 7.2, Privacy Policy, CASL and Website

**Preface:** Most elements of this policy are taken directly from the Personal Information Protection Act (PIPA)

At The Cridge Centre for the Family, we are committed to providing our clients, customers and members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information protecting personal information is one of our highest priorities.

While we have always respected and safeguarded 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 clients, customers and members 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. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that you choose to share with us.

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

In addition to PIPA, we comply with Canada's Anti-Spam Legislation (CASL), which protects consumers and businesses from the misuse of digital technology, including spam and other electronic threats. It also aims to help our organization stay relevant, literate and competitive in a digital marketplace.

**Scope of this Policy**

The requirement to follow this Personal Information Protection Policy applies to The Cridge Centre for the Family and all persons whether employees, volunteers, Board or committee members.

This policy also applies to any service providers and all contractors collecting, using or disclosing personal information on behalf of The Cridge Centre for the Family.

## Definitions

1. Personal Information – means information about an identifiable individual i.e. including name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, education, employment information. Personal information does not include contact information (described next).

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2. 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.
3. Privacy Officers – means the individuals designated responsibility for ensuring that The Cridge Centre for the Family complies with this policy and PIPA.

## Collecting Personal Information

Unless the purposes for collecting personal information are obvious and the client, customer, member voluntarily provides his or her 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.

Obvious uses include:

1. To verify identity;
2. To identify client, customer, member preferences;
3. To open and manage an account;
4. To deliver requested products and services
5. To enrol the client in a program;
6. To send out organizational information;
7. To contact our clients, customers, members for fundraising;
8. To ensure a high standard of service to our clients, customers, members;
9. To meet regulatory requirements;
10. To assess suitability for tenancy;
11. To collect and process rent payments;

## Consent

1. We will obtain client, customer, member consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
2. Consent can be provided orally, in writing, electronically or through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client, customer, member voluntarily provides personal information for that purpose.
3. Consent may also be implied where a client, customer, member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the client, customer, member does not opt-out.
4. Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients, customers, members can withhold or withdraw their consent for

The Cridge Centre for the Family to use their personal information in certain ways. A client's, customer's, member's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client, customer, member in making the decision.

5. We may collect, use or disclose personal information without the client's, customer's, member's knowledge or consent in the following limited circumstances:
  - a) When the collection, use or disclosure of personal information is permitted or required by law;
  - b) In an emergency that threatens an individual's life, health, or personal security;
  - c) When the personal information is available from a public source (e.g., a telephone directory);
  - d) When we require legal advice from a lawyer;

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- e) For the purposes of collecting a debt;
- f) To protect ourselves from fraud;
- g) To investigate an anticipated breach of an agreement or a contravention of law

### Using and Disclosing Personal Information

1. We will only use or disclose client, customer, member personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes.
2. We will not use or disclose client, customer, member personal information for any additional purpose unless we obtain consent to do so.
3. We will not sell client, customer, member lists or personal information to other parties.

### Retaining Personal Information

1. If we use client, customer, member personal information to make a decision that directly affects the client, customer, member, we will retain that personal information for at least one year so that the client, customer, member has a reasonable opportunity to request access to it.
2. Subject to policy 4.1, we will retain client, customer, member personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose, except as required to be retained by law, all personal information will be deleted, erased or made anonymous no later than ten years after the purpose for which it was collected has been completed.

### Ensuring Accuracy of Personal Information

1. We will make reasonable efforts to ensure that client, customer, member personal information is accurate and complete where it may be used to make a decision about the client, customer, member or disclosed to another organization.
2. Clients, Customers, Members 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.
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 clients', customers', members' correction request in the file.

## Securing Personal Information

1. We are committed to ensuring the security of client, customer, member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
2. Security measures will be followed to ensure that client, customer, member personal information is appropriately protected.  
*Examples may include: 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.*
3. We will use appropriate security measures when destroying client's, customer's, member's personal information such as shredding documents, deleting electronically stored information.
4. We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## Providing Clients, Customers, Members Access to Personal Information

1. Clients, Customers, Members have a right to access their personal information, subject to limited exceptions.

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2. A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer.
3. Upon request, we will also tell clients, customers, members how we use their personal information and to whom it has been disclosed if applicable.
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.
5. A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the client, customer, member of the cost and request further direction from the client, customer, member on whether or not we should proceed with the request.
6. If a request is refused in full or in part, we will notify the client, customer, member in writing, providing the reasons for refusal and the recourse available to the client, customer, member.

## Surveillance

For the purposes of the health, safety and security of residents and staff, areas of the Seniors' Assisted Living Centre have video recording cameras. Places specifically for employees personal comfort, health or for safeguarding their possessions are never videotaped. The Cridge Centre does not employ any hidden security cameras nor does it record audio.

## Reporting to Outside Governing Agencies

1. The Cridge Centre for the Family collects and manages client records under contract according to provincial policy and the Freedom of Information and Protection of Privacy Act and other applicable legislation. The parties agree to share client/patient records where legislation permits and as otherwise required under the contract. It understands that while operating government funded contracts for the care of brain injured clients, records created may be the property of the government and the organization acts as the

custodian. Government policy prevails in the management and disclosure of those records.

2. When records and/or information is requested from agencies other than funders, the request will be forwarded to the Privacy Officers.

#### **Questions and Complaints: The Role of the Privacy Officer or designated individual**

1. The Privacy Officer is responsible for ensuring The Cridge Centre for the Family's compliance with this policy and the *Personal Information Protection Act*.
2. Clients, Customers, Members should direct any complaints, concerns or questions regarding The Cridge Centre for the Family's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client, customer, member may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for The Cridge Centre for the Family's Privacy Officer:

Adam Richards, CEO, 250-995-6403, arichards@cridge.org

Tanya Kuhn, 250-995-6410, tkuhn@cridge.org

Further information on privacy and your rights in regard to your personal information may be found on the website of the Privacy Commissioner of Canada at [www.privcom.gc.ca](http://www.privcom.gc.ca) or the corporate Privacy and Information Access, BC Ministry of Management Services at [www.bcstats.gov.bc.ca](http://www.bcstats.gov.bc.ca)

