

# GRACE UNITED CHURCH, Caledonia

## Policy and Procedure Manual

<b>Policy Title</b>	<b>PRIVACY</b>	<b>Policy Number</b>	<b>PPM-A3.1</b>
<b>Date of Approval by Council</b>	June 16, 2021		
<b>Revision Dates</b>		<b>Date of next Review</b>	May 2027

### **POLICY STATEMENT:**

Grace United Church, Caledonia understands that the security of personal information is a significant concern in the digital age. Whenever and wherever reasonably possible, Grace United Church, its employees and volunteers, will respect the dignity, rights and wishes of individuals who provide personal information, following the basic principles and procedures laid out in this policy, relevant legislation, and by The United Church of Canada.

### **PRINCIPLES:**

- *Personal information* includes both factual and subjective information that can directly or indirectly identify characteristics of a specific individual. That individual has the right to control how and with whom the information is shared. In most cases more than one kind of personal information must be combined to be considered private information (eg. name & birth date), and the information is usually not generally available from public sources (eg. a telephone directory).
- *Confidential information* is that provided in discussion, writing, or otherwise that in order to maintain trust and integrity should not be inappropriately disclosed beyond the originating individual, parents in the case of a minor, and specific staff and/or volunteers needing it to complete processes and tasks authorized through their roles at Grace United Church. Unless otherwise stated by law, this includes, but is not limited to, employee records and internal discussions of the Ministry & Personnel Committee (but not the results of such discussions that must be reported to Church Council to facilitate reasonable decision making); health information; baptism, confirmation, membership, and wedding registries (where the person is reasonably still alive); donor records (beyond those for which a list of names and contact information for in-memoriam gifts is provided to the family of a deceased person); and personal conversations in pastoral care settings (unless permission to share specific details is granted). See Confidentiality Agreement to be signed by staff/volunteers regularly accessing private info.
- *Transparency* means that when information is confidential, methods, reasons, process and procedures are clear, open and can be questioned by those involved. The opposite of transparency is *secrecy*, when the withholding of information unreasonably impedes the functionality or the decision-making ability of those involved.

### **PROCEDURES:**

#### **A. Purposes for Collection/Use of Personal Information**

Whenever reasonably possible, Grace United, Caledonia will communicate the purposes for which information is collected and maintained, either orally or in writing at the time it is collected, or when a new purpose is identified. Purposes include, but are not limited to:

- Providing information or conducting research on church activities, programs and services
- Maintaining adequate stewardship and care for human and financial resources, including statistical, donor, screening, and employee records

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- the issuing of thank you notes, charitable receipts, and tax or employment forms
- Providing services (eg. summer camp/baptism/wedding/funeral) to meet spiritual, educational, and human needs of the community, congregation, donors, and employees
- Contributing to the formation of community within our congregation (eg. congregational prayer lists/cards/bulletins/newsletters/directory/annual report) & the larger United Church
- Promoting the mission and outreach services of both our community of faith and the larger United Church
- Verifying identities for legal and/or government filings
- Providing for the transfer of appropriate records to the United Church Regional Archives for archival and future research purposes

Grace United, Caledonia will never sell member, adherent, or donor lists to any unrelated individual or organization. Information will not be collected unlawfully or indiscriminantly.

### B. Consent

Consent for the collection of information may be written, spoken, or implied. Consent for the use and/or maintenance of the information may be withdrawn at anytime, with the understanding that such withdrawal may create an inconvenience to the person (eg. no charitable tax receipts, inability to be notified or participate in certain programs). Individuals wishing some or all of their information withdrawn from use should notify both the church office and any person(s) publicly responsible for its collection/use (eg. a convenor updating the congregational directory).

Grace United, Caledonia may also collect, use, or disclose personal information without knowledge or consent in the following exceptional circumstances:

- When permitted or required by law, including an anticipated breach of law
- In an emergency that threatens an individual's life, health, or personal security
- When the information is publicly available

### C. Accuracy & Access

Grace United, Caledonia will make reasonable efforts to ensure that personal information it collects and maintains is accurate, complete, and secure from unauthorized access. Individuals providing information for the weekly announcements, newsletters and annual reports should be aware they are posted on the church website. In most cases, individuals will be relied upon to provide updates to their own information; however, from time to time updates may also be made using other reliable sources such as confirmed family members or public documents.

Information no longer required for any of the purposes it was collected for and not subject to legal or archival retention will normally be destroyed after a reasonable timeframe, eg. after the completion of an event, after an employee, member or adherent has left for at least three years, or in the case of financial records, six full years. Depending on the nature of the information, where it is reasonable to do so, some portions of records may be destroyed earlier than others (eg. maintaining an event contact list but destroying health information connected to those contacts after thirty days).

Anyone who has provided personal information to Grace United, Caledonia has a right to review and request changes to their own personal information. Upon written request (and with suitable confirmation of identity) the church will, within a reasonable time period, report what personal information it has, the known purposes it is being maintained for (as listed in Section A), and the persons and/or positions who may have access to it.

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If a request for information is refused, the community of faith will notify the requester in writing of the reasons for refusal. Reasons may include that it is unreasonably costly to provide; that the information could threaten the security of another individual; that it was information generated in a formal dispute resolution process; that the information contains references to other individuals; that the information cannot be disclosed for legal or security reasons; or that it is information that is subject to solicitor-client or litigation privilege.

Other than publicly available methods of contacting employees or volunteers, individuals seeking contact/personal information for anyone connected with Grace United Church should be directed to provide their own contact information, which will be passed on to the person in question (should they be known) to decide on any response.

### D. Accountability/Safeguarding

Grace United, Caledonia is committed to ensuring that reasonable and appropriate security measures are used in both the storage and transfer of sensitive personal information provided to it, such as locked offices/cabinets and computer passwords, and proper disposal, such as shredding of paper records and reformatting of deprecated electronic storage devices.

Grace United Church Council will appoint one or more Privacy Officer(s) to ensure records containing personal information are properly maintained and respond to questions and concerns from individuals about information maintained by Grace United, Caledonia. The Privacy Officer(s) will normally be someone already involved in the maintenance of the church records. If the Privacy Officer is unable to satisfactorily address a concern, the issue can be referred to a committee made up of the Chair of Church Council, the Chair of the Ministry & Personnel Committee, and the Minister. If any of these individuals have a conflict regarding the individual making the complaint, Church Council will appoint a substitute.

Grace United, Caledonia is not accountable for any damages suffered when personal information is transmitted to it via electronic or wireless means, or when Grace United, Caledonia transmits such information at the request of the individual.

Complaints, concerns, or questions regarding this privacy policy may be directed in writing to the Chair of Grace United Church Council, and/or the Privacy Officer(s) appointed by Grace United, Caledonia at the church address.

### E. Photography/Audio-Visual Recording

Grace United Church is a semi-public facility. Staff and volunteers at Grace United, Caledonia may take pictures and/or audio/video recordings for archival and promotional purposes, including but not limited to use in congregational newsletters, slide shows, annual reports, local newspapers, church website(s) and for the United Church Archives. Other individuals may be taking photos for personal purposes. Individuals who wish to limit their appearance in such visual records should make their wishes known to the photographer as soon as possible, and/or sit in the back half of the Sanctuary/room. When feasible, parental permission will be sought for candid photography involving minors.

#### **POLICY/PROCEDURE REVIEW:**

**Time Frame:** Every three years

**Committee Responsible:** Council Executive, Ministry & Personnel  
All policy revisions require Council approval.

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### EXAMPLE PRIVACY STATEMENT (BAPTISM):

The use, retention and disclosure of personal information collected on this form is done in compliance with privacy legislation for the purposes of facilitating the Baptism/Dedication, including but not limited to recording in the Baptism Register, Worship Service program, Church Council minutes, and the Annual Congregational Report, as well as communication from staff and volunteers at Grace United Church, Caledonia. Information will not be disclosed to third parties except for the purposes identified. The official Baptism Registry is confidential until 104 years after date of birth. Records will not be disclosed to anyone other than the individual baptised or the parents of an individual under age 18.

Upon occasion photographs may be taken of activities at Grace United Church for purposes of newsletters (published online), slideshows, posters, church website or internal directories. If you prefer photos of you and/or your family not be used for any of these purposes, please indicate by striking out any of the specific purposes listed above.

### CROSS REFERENCES:

Privacy Commissioner of Canada <https://www.priv.gc.ca>

How PIPEDA applies to charitable and non-profit organizations  
[https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/r\\_o\\_p/02\\_05\\_d\\_19](https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/r_o_p/02_05_d_19)

Personal Information Protection and Electronic Documents Act (2000, c.5).  
<https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda>

United Church of Canada Personal Information Policy  
[https://united-church.ca/sites/default/files/privacy\\_and\\_personal\\_information.pdf](https://united-church.ca/sites/default/files/privacy_and_personal_information.pdf)

Privacy Issues: Recordkeeping & Archives  
[https://united-church.ca/sites/default/files/handbook\\_privacy-issues-archives-recordkeeping.pdf](https://united-church.ca/sites/default/files/handbook_privacy-issues-archives-recordkeeping.pdf)

Record Keeping  
<https://www.ontario.ca/document/your-guide-employment-standards-act/record-keeping>

Confidentiality/Non-Disclosure Agreement (Addendum)

### ADDENDUM: CONFIDENTIALITY/NON-DISCLOSURE AGREEMENT

## **GRACE UNITED CHURCH**

174 Caithness St. E.,  
Caledonia ON N3W 1C2

### **Confidentiality/Non-Disclosure Agreement**

This Nondisclosure Agreement is entered into by and between Grace United Church, Caledonia, Ontario, and \_\_\_\_\_ for the purpose of ensuring the confidentiality of members, adherents, donors, and others who may disclose information of a personal or sensitive nature while participating in activities, seeking support or requesting services from Grace United Church or the United Church of Canada.

I, \_\_\_\_\_, agree to protect and maintain the confidentiality of all individuals and situations to the best of my ability in my capacity as (circle) an employee / volunteer of Grace United Church, limiting any disclosure to publicly available information, the wishes of the person providing the confidential information, the Minister of Grace United Church, and/or members of Church Council where the information is required for them to carry out their duties in a reasonable and efficient manner.

I acknowledge that any breach of this agreement will be reviewed by the Privacy Officer(s) and/or the Ministry & Personnel Committee of Grace United Church, which, depending on the seriousness of the breach, will make a recommendation to the Church Council, up to and including possible termination from a position/role.

Nothing in this agreement limits any legal duty to report a criminal or other similar situation to the appropriate authorities.

I acknowledge that the requirements of this confidentiality agreement will remain in force regardless of whether I remain an employee/volunteer at Grace United Church, until such time as the confidential information becomes publicly known or I am specifically released from my obligations under this agreement.

Agreed to upon this date, \_\_\_\_\_ 20\_\_.

\_\_\_\_\_  
(name/position of individual)