



## **ARCHDIOCESE OF VANCOUVER**

### **PRIVACY POLICY**

Prepared by Deidre Simmons  
Archives Consultant

Approved by Archbishop Raymond Roussin S. M.  
July 2005

July 2004  
Page 1

## **Introduction**

The Archdiocese of Vancouver is responsible for protecting the personal information of its employees, donors, volunteers, parishioners and all individuals who provide services to or use the services of this organization. While the Archdiocese has always respected the privacy of individuals according to Canon Law, it has strengthened its commitment to protecting personal information as a result of the implementation of British Columbia's *Personal Information Protection Act* (PIPA) on 1 January 2004.

PIPA regulates the way private sector organizations collect, use, keep secure, and disclose personal information and ensures that organizations that hold information about individuals handle that personal information responsibly. The legislation also gives individuals control over the way information about them is handled and a right to request access to and correction of their personal information. It prevents the collection, use and disclosure of personal information without the consent of the individual.

This Privacy Policy outlines the principles and practices the Archdiocese of Vancouver follows to protect the personal information of its employees, donors, volunteers, parishioners and all individuals who provide services to or use the services of this institution. A privacy commitment includes ensuring the accuracy, confidentiality and security of personal information and allows individuals to request access to and correction of their personal information...

The Privacy Policy of the Archdiocese of Vancouver, and its attention to the PIPA legislation, is a testament to the dedication to protection of individual privacy and access to personal information. It is balanced by Canon Law which also addresses privacy issues and will continue to provide guidance to the Archdiocese in matters of privacy protection and access to personal information. PIPA is not retroactive and does not cover personal information collected prior to its implementation. That information is protected under the relevant statutes of Canon Law.

This Privacy Policy is also written to inform interested parties of the steps taken to safeguard personal information held in the archdiocesan parishes and office.

The Archdiocese of Vancouver will review this Privacy Policy periodically to ensure its commitment to protection of personal information and compliance with the PIPA legislation.

## **Definitions**

Archdiocese of Vancouver - the entity responsible for ministering and shepherding the Catholic community of Vancouver. This designation includes all parishes, offices and organizations that comprise this juridical entity. Also known as the Metropolitan See of Vancouver.

collection - the act of gathering, acquiring or obtaining personal information.

consent - voluntary agreement to the collection, use or disclosure of personal information for defined purposes.

contact information - 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 email or fax number of the individual.

disclosure - the act of making personal information available to other offices, parishes, dioceses or individuals connected with the Archdiocese of Vancouver.

individual - any person who provides personal information to the Archdiocese or requests access to information under its authority.

personal information - recorded information, in any form, about an identifiable individual, excluding contact information (see definition above) and work product information.

Privacy officer - the individual designated for ensuring the Archdiocese complies with this the Privacy Policy and PIPA.

third party - an individual or organization outside the Archdiocese of Vancouver.

use - the treatment, handling and management of personal information by and within an organization.

work product - information that is prepared or collected by our employees, contractors or volunteers as part of their responsibilities or activities related to their employment, business or volunteer agreement.

## **Scope**

Prepared by Deidre Simmons  
Archives Consultant

July 2004  
Page 3

Approved by Archbishop Raymond Roussin S. M.  
July 2005

The Privacy Policy applies to the Archdiocese of Vancouver and the offices, parishes, schools, agencies and organizations under the authority of the Archdiocese (its agencies). It also applies to any service providers collecting, using or disclosing personal information on behalf of the Archdiocese of Vancouver. It does not apply to contact information or work product information.

**Policy 1: Accountability**

The Archdiocese of Vancouver is responsible for protecting the privacy of individuals whose personal information is under its care.

The Chancellor of the Archdiocese of Vancouver is designated the Privacy Officer and is responsible for compliance to PIPA and Canon Law statutes as well as to the administration of the Privacy Policy. The Chancellor may delegate these duties to another individual.

**Policy 2: Collection of Personal Information**

The Archdiocese of Vancouver collects and retains personal information for a variety of purposes that are essential to its effective and efficient operation. The purposes for which personal information is requested will be explained by the Archdiocese of Vancouver or its agencies at the time of collection of the information. Personal information will be used only for the purpose for which is collected.

The Archdiocese of Vancouver may collect personal information from individuals for the following purposes:

- for sacramental records (baptism, confirmation, marriage or death);
- to verify an individual's identity;
- to provide access to services offered by the Archdiocese of Vancouver or its agencies;
- to process donations;
- for promotional material;
- to meet civil or canonical legal and/or regulatory requirements.
- to establish, manage or terminate an employment relationship.

The Archdiocese of Vancouver will collect personal information only for those purposes that are necessary and have been identified to the individual.

**Policy 3: Consent**

Before or at the time of collection, the Archdiocese of Vancouver will obtain an individual's

consent to collect, use, or disclose personal information, except under the following circumstances:

- when such collection, use, or disclosure is permitted or required by law;
- when the Archdiocese requires legal counsel;
- when the Archdiocese anticipates breaches of civil or canon law;
- when a pastor requests sacramental information regarding a parishioner for the purposes of administering another sacrament (confirmation, marriage, anointing of the sick, etc.);
- when required by the Archbishop or Chancellor of the Archdiocese of Vancouver.

Consent may be made orally, electronically, or in writing. An individual may withdraw consent, in the same manner, at any time subject to legal or contractual restrictions. Withdrawal of consent may prevent the Archdiocese from administering relevant services.

#### **Policy 4: Use and Disclosure**

The Archdiocese of Vancouver will use or disclose personal information according to the purposes for which it was collected. If the Archdiocese or its agencies require the personal information for purposes other than those initially agreed to, the individual will be asked to provide consent for the new use.

- The Archdiocese may transfer personal information between itself and its agencies, and vice versa, in adherence to civil and canon law statutes.
- Personal information will be retained only as long as necessary to fulfill the stated purposes identified at the time of collection.
- Sacramental records and some administrative files with archival or historical value may be transferred to the Archives of the Archdiocese of Vancouver according to records management policy. Disclosure of personal information for archival or historical purposes is limited under Sections 21 and 22 of the *Personal Information Protection Act*.

The Archdiocese of Vancouver is committed to ensuring that the personal information it collects and maintains is as accurate, and complete as required for the purposes it was collected. Individuals may request correction or changes to their personal information in order to ensure its accuracy and completeness. Should there be a dispute regarding the corrections and/or changes the Archdiocese will record the individual's opinion and include it on the file.

#### **Policy 5: Security**

Reasonable security arrangements will be made to protect personal information in the custody and control of the Archdiocese or its agencies.

- The Archdiocese of Vancouver has policies and security measures in place to ensure the protection of personal information in any format against access, disclosure, modification, and use.
- All employees and volunteers are trained to be aware of the importance of confidentiality and security of personal information and are required to sign an oath of confidentiality as prescribed by Canon Law.
- Records containing personal information will be destroyed according to records management procedures when no longer required.

**Policy 6: Access**

Individuals have the right to access their personal information that is in the possession of the Archdiocese of Vancouver subject to limited exceptions. Individuals have the right to know how their personal information is used by the Archdiocese and its agencies and to whom it has been disclosed, if applicable.

- A request for access to personal information must be made in writing to the Privacy Officer of the Archdiocese of Vancouver.
- A request must provide sufficient detail to identify the personal information sought.
- The Archdiocese of Vancouver will provide the requested information within thirty (30) business days, or will provide written notice of an extension where additional time is required to fulfill the request.
- A minimal fee may be charged for providing access to personal information that is not employee personal information. Where a fee for services may apply, the individual will be given a written estimate and may be required to pay a deposit.
- If the Archdiocese of Vancouver is unable to provide the requested information, the individual will be notified in writing with the reason(s) for refusal of access. The individual will also be provided with information on the recourse available.

**Policy 7: Compliance**

Any complaints arising from the Privacy Policy or the handling of personal information by the Archdiocese of Vancouver must be made in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the individual may also write to the Information and Privacy

Commissioner of British Columbia.

**Contact Information:** Privacy Officer  
Archdiocese of Vancouver  
Chancery Office  
150 Robson Street  
Vancouver, BC V6B 2A7