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## **PRIVACY AND CONFIDENTIALITY POLICY**

This policy represents the intention of Central United Church (Central) with regard to the protection and security of personal information, as well as maintaining confidentiality to safeguard personal information.

### **STATEMENT OF PURPOSE AND BELIEF**

Central is a Christian community, living out the ministry of Jesus in downtown Calgary. The basic principle guiding our interactions with one other and the people who enter our church is a deep respect for their dignity and a deep concern for their well-being.

Central believes that each person, as a beloved child of God, has the right to be informed as to why personal information about them is being collected. In addition, permission to gather personal information about an individual must be given directly to the church by that individual. Permission to obtain personal information from children and other vulnerable sectors of our church population must be obtained from a parent, guardian or recognized legal authority. Central will, to the best of its ability, protect and safeguard any personal and private information that is provided to Central in the conduct of its ministry.

### **POLICY**

- (a) Personal information collected from members or adherents of the church (e.g., personal contact information) will only be used for its stated and intended purpose.
- (b) Federal and provincial privacy laws require that Central obtain an individual's consent prior to collecting, using, or disclosing personal information.
- (c) In the case of children, youth and other vulnerable sectors of the church population, written consent to gather information must be obtained from a parent, guardian or recognized legal authority.
- (d) Individuals who have offered their personal information to Central have the right to access that information, challenge its accuracy or ask to have their information removed from the church database.
- (e) The Personal Information Protection and Electronic Documents Act (PIPEDA) applies to Central and governs the collection, use, disclosure, retention, and disposal of personal information. PIPEDA also applies to personal employee information.



- (f) As a registered charity, Central is not governed by the Freedom of Information and Protection of Privacy Act, however, Central will seek to follow this legislation as it applies to the collection of data for our church and our ministry.
- (g) Central will follow the principle of best practices when safeguarding the personal information of a person, thereby upholding privacy, and maintaining confidentiality. Those best practices include:
  - respect for human dignity.
  - respect for free and informed consent.
  - respect for vulnerable persons.
  - respect for privacy and confidentiality,
  - assessment of harms and benefits (e.g., no harm should come to individuals because Central has collected their personal information).
- (h) Central is responsible for personal information under its control and shall designate a Duty of Care Officer (DCO) to ensure that Central complies with the Privacy and Confidentiality policy document it has created.
- (i) Personal information will be collected by fair and lawful means.
- (j) Central is allowed to keep a hard copy of credit card information as long as it is kept in the church vault. Only the Finance Team Chair, the Treasurer, the Office Administrator and the Chair of the Count Team may have access to the church vault.
- (k) No electronic or soft copy of credit card information may be kept on file unless the database has encryption software.
- (l) Personal information shall be as accurate, complete and up to date as necessary for the purposes for which it was collected.
- (m) Central will make readily available to individuals and to the congregation specific information about its policies and practices relating to the management of personal information.
- (n) Personal information must not be left unattended in public places (e.g., file boxes, desktops) and must be protected by specific safeguards, including measures such as locked cabinets and computer passwords.
- (o) This document must be examined at least once a year, along with all provincial and federal laws to ensure that Central is acting in compliance with any changing laws or requirements.
- (p) Failure on the part of employees or paid contractors to comply with this policy may constitute grounds for dismissal.
- (q) A high standard of compliance to this policy document is expected of Central volunteers. Non-compliance will result in removal from volunteer positions.



## **ADMINISTRATION**

The Board oversees and upholds compliance with this policy document, working in collaboration with the DCO.

This policy document is a living document and can be changed at any time, with the approval of the Board.

The Board must inform the congregation about the policies that have been established by the Board and will seek ratification of each policy change at an Annual Congregational Meeting.

*Final Draft Approved by the Board, September 1<sup>st</sup>, 2018*

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