

KELOWNA CHILD CARE SOCIETY
PRIVACY PROTECTION POLICY FOR CLIENTS
DATE ADOPTED: SEPTEMBER 16, 2004

Statement and Purpose

The Kelowna Child Care Society respects and upholds an individual's right to privacy and to protection of his or her personal information. The Kelowna Child Care Society is committed to collecting, using and disclosing personal information in a manner which complies with applicable privacy legislations.

The Policy sets out the principles, which will be observed by the Kelowna Child Care Society with respect to the collection and use, and disclosure of information about any identifiable individual who is a client of the Kelowna Child Care Society. If personal information is made anonymous by removing details so that an individual is not identifiable, it is not governed by this Policy but will still be treated with appropriate safeguards.

Definition of a "Client" is a person who uses, or applies to use any services of the Kelowna Child Care Society.

Principles and Implementation

1. Accountability

The Kelowna Child Care Society is responsible for all personal information under its control. Its Privacy Officer is accountable for the Kelowna Child Care Society's compliance with the principles described in this Policy.

The Privacy Officer can be contacted at:

The Kelowna Child Care Society
Attention: Privacy Officer
Telephone: (250) 762-3536
Kelowna, B.C. V1Y 4R9
#4 –1890 Ambrosi Road
Facsimile: (250) 861-1299
E-mail: executivedirector@kelownachildcare.com

Upon request, the Kelowna Child Care Society will disclose the name of the current Privacy Officer.

Under this principle, the Kelowna Child Care Society is responsible not only for personal information in its physical possession or custody, but also for personal information that is transferred by the Kelowna Child Care Society to a third party for processing. The Kelowna Child Care Society will use contracts with such third parties to require them to give an appropriate level of protection to the personal information while it is being processed.

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The Kelowna Child Care Society has established and implemented:

- a) Procedures to protect personal information;
- b) Procedures to receive and respond to complaints and inquiries;
- c) Staff training and information programs to explain this Policy and related privacy policies and practices;
- d) Practices to ensure that clients who contact the Kelowna Child Care Society have access to this Policy.

2. Purposes for Collection, Use, and Disclosure

The purposes for which personal information is collected will be identified and documented by the Kelowna Child Care Society at or before the time the information is collected.

Personal information will be collected on a “need to know” basis for the operation of the Kelowna Child Care Society.

Depending on the specific circumstances, the Kelowna Child Care Society may collect personal information concerning clients for one or more of the following purposes:

1. to evaluate the eligibility and suitability of a client to receive Kelowna Child Care Society CCRR Program services
2. to communicate with the Ministry concerning the client’s eligibility for assistance
3. to administer and maintain a registry of current member clients receiving annual membership services
4. for the purpose of child care referrals
5. to communicate with clients concerning the Kelowna Child Care Society’s programs and services
6. to comply with legal and regulatory requirements

In the event that the Kelowna Child Care Society wishes to collect personal information for a new purpose, the Kelowna Child Care Society will take reasonable steps to insure that the individual concerned is informed of the new purpose and gives his or her consent to the collection of personal information for the purpose.

3. Consent

The knowledge and consent of the individual, express or implied, are required for the collection, use or disclosure of personal information by the Kelowna Child Care Society, except where inappropriate by law or circumstance. Implied consent may arise through action or inaction on the part of the individual.

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The Kelowna Child Care Society will ensure that the client is entitled to easy-to-understand methods for consent. Check off boxes will be used on the Kelowna Child Care Society's forms for client's convenience in receiving future Kelowna Child Care communications. If the check off box is not marked by the individual, the Kelowna Child Care Society will be entitled to assume that he or she has consented. When special attention to the issue of consent is required, express consent will be employed.

An individual client may withdraw his or her consent to collection, use or disclosure. The Kelowna Child Care Society shall inform the individual of the likely consequences to the individual of such withdrawal of consent for the continued provision of Kelowna Child Care services.

4. Limited Collection

The Kelowna Child Care Society will limit the amount and type of personal information collected to that which is necessary for the purposes identified by the Kelowna Child Care Society.

5. Limiting Use, Disclosure and Retention

The Kelowna Child Care Society will not use or disclose personal information for purposes other than those for which it was collected, except with consent of the individual or as required or permitted by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes. Any personal information will be stored in a locked office or cabinet at the Kelowna Child Care Society and will be accessed only on a "need to know" basis.

6. Accuracy

The Kelowna Child Care Society will make every reasonable effort to ensure that personal information collected by Kelowna Child Care or on its behalf is as accurate and complete as is necessary for the purpose for which it is to be used.

The Kelowna Child Care Society will not routinely update personal information, unless such updating is necessary to fulfill the purposes for which the information is collected.

The Kelowna Child Care Society will generally reply on clients to provide updated information, such as changes to addresses and other contact information.

7. Safeguards

The Kelowna Child Care Society will make reasonable security arrangements to protect personal information.

Safeguard arrangements are employed to protect personal information against loss or theft, as well as authorized access, disclosure, copying, use, modification, or disposal.

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The Kelowna Child Care Society shall protect personal information regardless of the format in which it is held.

The methods of protection employed by the Kelowna Child Care Society will include:

- physical measures, including locked filing cabinets and restricted access to offices;
- organization measures, such as a “clean desk” policy and limiting access on a “need to know” basis;
- technological measures, such as use of passwords and access to electronic files.

8. Openness

The Kelowna Child Care Society will ensure that any individual is able to acquire information about Kelowna Child Care’s policies and procedures on privacy protection without unreasonable effort. The Kelowna Child Care Society will make this information available in a form that is generally understandable.

9. Individual Access

When requested in writing, the Kelowna Child Care Society shall inform the individual of the existence, use, and disclosure of his or her personal information and the individual shall be given access to that information, except where law requires or permits the Kelowna Child Care Society to deny access.

The Kelowna Child Care Society shall respond to a request in writing as accurately and completely as reasonably possible within 30 days after receipt of the request.

10. Challenging Compliance

Any individual can direct complaints concerning Kelowna Child Care’s compliance with privacy protection to the Privacy Officer. The Kelowna Child Care Society’s procedure to respond to complaints or inquiries, about the Kelowna Child Care Society’s handling of personal information, is as follows:

- A complaint must be in writing attention to the Privacy Officer;
- Kelowna Child Care Society will acknowledge receipt of the complaint in writing promptly;
- Kelowna Child Care Society will contact the client to clarify the complaint, if necessary;
- Kelowna Child Care Society will investigate all complaints received;
- Kelowna Child Care Society will notify the client of the outcome of investigations clearly and promptly, informing them of any relevant steps taken;
- Kelowna Child Care Society will correct any inaccurate personal information or modify policies and procedures based on the outcome of complaints.