



Personal Information Protection Policy

At The Centre for Child Development (“The Centre”), we are committed to providing our clients, with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, protecting their personal information is one of our highest priorities.

While we have always respected our clients’ privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information and to ensure that we comply with all relevant privacy legislation.

We will inform our clients why and how we collect, use, handle, and disclose their personal information, and obtain their consent where required.

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

Definitions

Personal Information – means information about an identifiable *individual including name, age, home address and phone number, or medical information*. Personal information does not include business contact information (described below).

Business 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.

Privacy Officer – means the individual designated responsibility for ensuring that the Centre complies with this policy, and relevant privacy legislation.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the client 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.

1.2 We collect client information that is necessary to fulfill the following purposes:

- To verify identity;
- To identify client preferences;
- To understand the medical needs of our clients;
- To deliver requested products and services
- To provide medical services;
- To enroll the client in a program;
- To meet legal and regulatory requirements
- To ensure a high standard of service to our clients;

1.3 We will only collect, use, or disclose personal information in accordance with relevant privacy legislation.

Policy 2 – Consent

2.1 We will obtain consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

2.2 When consent is required for a minor, we will obtain consent from the minor's legal guardian. In cases where the minor is 14 years of age or older and capable of providing assent, we will seek the minor's assent for the collection, use, or disclosure of personal information.

2.3 We may obtain consent from a minor without the consent of the legal guardian in accordance with the British Columbia *Infants Act*, to collect, use, and distribute personal information related to the minor. Such requests must be approved by the relevant department head and the Centre's CEO.

2.4 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 voluntarily provides personal information for that purpose.

2.5 Consent may also be implied where a client is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, and the client does not opt-out.

2.6 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would impede the performance of a legal obligation), clients can withhold or withdraw their consent for the Centre to use their personal information in certain ways. A client'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 in making the decision.

Policy 3 – Using and Disclosing Personal Information

3.1 We will only use or disclose client personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as to conduct client surveys in order to enhance the provision of our services;

3.2 We will not use or disclose client personal information for any additional purpose unless we

obtain consent to do so, or in a manner consistent with this Policy.

3.3 We may collect, use or disclose personal information without the client's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law or a duly empowered regulatory body;
- In an emergency that threatens an individual's life, health, or personal security, as required by the British Columbia *Child, Family, and Community Service Act*.
- When we require legal advice from a lawyer.

3.4 We will never sell or rent client lists or personal information to other parties.

3.5 For families who are willing to assist the Centre with promotion and/or fundraising, we will forward your contact information to the Child Development Foundation of British Columbia ("The Foundation"), a separate not-for-profit charitable society whose mission and purpose is to support the Centre. We will never forward client information to the Foundation without first obtaining consent from the child and/or legal guardian as appropriate. Any appearances, photographs, videos, or other work in which a family may engage on behalf of the Foundation will be governed by the policies and procedures of the Foundation.

Policy 4 – Retaining Personal Information

4.1 If we use client personal information to make a decision that directly affects the client we will retain that personal information for at least one year so that the client has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain client personal information only as long as necessary to fulfill the identified purposes or comply with legal, regulatory, and contractual obligations.

Policy 5 – Ensuring Accuracy of Personal Information

5.1 We will make reasonable efforts to ensure that client personal information is accurate and complete where it may be used to make a decision about the client or disclosed to another organization.

5.2 Clients may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information may be made verbally or in writing and provide sufficient detail to identify the personal information and the correction being sought. In some cases, we may require written documentation supporting the request.

5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required. At the clients' request, we will 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 client's correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of client personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that client personal information is appropriately protected:
- all client information will be stored in locked filing cabinets
 - our computer system has several layers of encryption and firewall protection
 - all staff have had information on this privacy policy and their responsibilities
- 6.3 We will use appropriate security measures when destroying client personal information such as shredding paper files and deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Client Access to Personal Information

- 7.1 Clients have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell clients how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 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.
- 7.5 If a request is refused in full or in part, we will notify the client in writing, providing the reasons for refusal and the recourse available to the client.
- 7.6 We will not release documents originating outside of the Centre unless required by law. Clients who wish to have third-party documents released will be referred to the original source of the document.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

- 8.1 The Privacy Officer is responsible for ensuring that the Centre for Child Development's compliance with this policy, and relevant privacy legislation.
- 8.2 Clients should direct any complaints, concerns or questions regarding the Centre for Child Development's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for the Centre for Child Development's Privacy Officer:

Dr. Brian Katz

Privacy Officer
The Centre For Child Development
9460 – 140 St.
Surrey, BC V3V 5Z4

Contact information for the British Columbia Office of the Information & Privacy Commissioner:

Office of the Information and Privacy Commissioner for British Columbia
PO Box 9038, Stn. Prov. Govt.
Victoria, BC V8W 9A4

<http://www.oipcbc.org/>