

# BC WHEELCHAIR BASKETBALL SOCIETY (BCWBS)

## PRIVACY POLICY & PROCEDURES

### 1. Introduction

BC Wheelchair Basketball Society (BCWBS) values and upholds your right to privacy and the protection of your personal information. BCWBS is committed to ensuring compliance with PIPA, British Columbia's "Personal Information Protection Act".

### 2. What is personal information?

"Personal Information" means all information about an identifiable individual.

### 3. Who we collect information from, type of information collected and uses and limits of the information collected?

BCWBS collects and maintains personal information that is required for its operations on five major groups of people:

- Employees,
- Volunteers,
- Members,
- Donors, and
- Board Members

The specific type and use of the information collected in each of these groups includes:

#### *Employees*

Demographic and other personal information regarding BCWBS employees is collected for payroll and benefits administration. These records along with personnel files that contain human resource information are kept in a very secure manner and access is restricted to appropriate members of the finance and management groups.

#### *Volunteers*

Demographic and other personal information regarding BCWBS volunteers is collected and kept as a point of reference for the society to be able to contact volunteers to represent and support BCWBS at program activities, special events, fundraising and administrative duties. The contact information is kept in a secure manner and access is restricted to appropriate individuals who require volunteers to carry out BCWBS activities.

#### *Members & Program Participants*

Demographic and other personal information is collected about members and program participants for several purposes. These purposes include the following:

- to establish and maintain a responsible relationship with our members and to provide ongoing service to all areas of wheelchair basketball in British Columbia;
- to support and assist our member clubs in delivering programs and services at the local level;
- to support and assist Canadian Wheelchair Basketball (CWBA) and BC Wheelchair Sports (BCWSA) responsible for delivering services to our members at the provincial, national, and international levels;
- to register our members on a confidential basis for special offers or programs with our program partners, or to third party agents responsible for administering such offers or programs;
- to understand needs and preferences;
- to manage and develop our operations;
- help us plan for future growth and,
- to meet regulatory requirements.

The information is gathered and used only after informed consent from the member and program participant is obtained. The information is kept in a secure manner and access is restricted to appropriate individuals within the organization who plan, develop and provide association program services.

#### *Donors*

Demographic and donation information is collected and updated for our donors so that BCWBS can issue tax receipts. We also use this information to keep donors updated on the fund raising needs of the organization. These records and other personal information collected from donors allow the organization to build relationships with donors and increase support through recognition and communication programs.

#### *Board Members*

As part of the nomination process to the Board, each prospective board member submits contact and biographical information. BCWBS provides this information to the membership once the members have been elected to the Board and maintains it over the duration of the tenure. This information may also be provided for reporting and grant application purposes.

BCWBS will inform people what information is being collected, how it will be collected and for what purposes. BCWBS will obtain consent for the collection, maintenance or sharing of material.

Information collected before **September 26, 2005** will be used for the general purposes for which it was collected, but members' consent will be obtained for any new uses.

BCWBS will limit the amount and type of information collected to that, which is reasonable and necessary to fulfil its stated purpose. BCWBS uses your personal information only for the purposes for which it is collected.

#### **4. Consent**

BCWBS will obtain your consent to collect, use or disclose personal information (except where authorized or required by law to do so without consent). Consent can be written, verbal, or implied, given through an authorized representative such as parent or guardian, lawyer or agent.

You have the right to refuse or withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. You may have your name removed from our telephone, mail or email lists. However, withdrawal may limit our ability to communicate with and serve you.

#### **5. Accuracy & Retention of Personal Information**

BCWBS strives to ensure that personal information maintained, used or collected is accurate. You have the right to review your information and request changes where you believe it is inaccurate.

The retention of personal information differs with each major group of people we collect information from. Once the appropriate time period has been surpassed, paper files are shredded and electronic files are deleted.

#### **6. Protection of Personal Information**

BCWBS will protect the privacy of personal information that is collected through:

- a) Implementing administrative procedures;
- b) Ensuring physical safeguards
- c) Managing technical security services and mechanisms

## **7. Accessing your Personal Information**

You have the right to access your personal information through the BCWBS Privacy Officer. Unless prevented by law, BCWBS will provide you with information regarding your personal information.

## **8. Recourse**

BCWBS has developed a complaint handling process. BCWBS will investigate all complaints received and take appropriate measures to correct information and handling practices as required. Individuals may appeal any BCWBS decision to the Information and Privacy Commissioner of British Columbia.

## **9. Privacy Officer**

The BCWSA Privacy Officer is:

Carrie Linegar  
BCWBS Managing Director  
C/O BC Wheelchair Basketball Society  
#224 – 1367 West Broadway,  
Vancouver, BC V6H 4A9  
[carrie@bcwbs.ca](mailto:carrie@bcwbs.ca)

The Board of Directors will appoint the Privacy Officer. The Privacy Officer should be knowledgeable about BCWBS's personal information management practices. The BCWSA Privacy Officer is the person within BCWBS whose job it is to:

- a) Encourage compliance with provisions of the personal Information Protection Act;
- b) Respond to requests for access to and correction of personal information and general issues concerning personal information;
- c) Work with the Information and Privacy Commissioner during an investigation of privacy complaint against BCWSB; and,
- d) Manage BCWBS's complaint process.

The Privacy Officer may be a volunteer or staff member.

## **10. Delegation of duties**

The Privacy Officer may delegate his or her duties to another individual. Such delegation must be written delegation, which is circulated, to the Board of Directors.

## **11. Forms**

BCWBS will review and revise its forms to include a statement of purpose. As appropriate, forms will also include a provision for an individual to opt out of providing some personal information. This includes written and electronic forms.

## **12. Communication materials**

Consent is not required to disclose information (including photos and videos) obtained by observation at a public event in which an individual voluntarily participates. However, as a courtesy, BCWBS will endeavour to obtain consent to use personal information in its publications such as layout, in communications materials such as posters and press releases and on its web site.

### **13. Accessing and Correcting Information**

An individual has the right to access their personal information and to correct errors of fact.

#### 13.1 Accessing your personal information

- a) Requests for access to personal information must be made in writing to the Privacy Officer. The request must include sufficient detail to enable the Privacy Officer to identify the information requests
- b) The Privacy Officer must respond to the request for access within 30 business days. The response must include, if requested, the ways, in which the personal information has or is being used, and a list of organizations to which the information has been disclosed.
- c) The Act identifies certain circumstances where information may be withheld. If the Privacy Officer withholds information, he or she must give the reason and identify the section in the Act under which the information is being withheld.

#### 13.2 Correcting your personal information

- a) If personal information held by BCWBS is incorrect, an individual may request correction by writing to the Privacy Officer. The individual must provide sufficient documentation to show that the correction is justified. Any original documentation supplied through this process by an individual will be returned, although copies will be taken for the file.
- b) The Privacy Officer will ensure that the appropriate corrections are made and that any incorrect information that has been disclosed within the year prior to the request is corrected.
- c) An individual may not correct opinions, but may annotate their file. This is done in writing to the Privacy Officer.
- d) An individual may not request original documents held by BCWBS but may request copies. BCWBS will provide copies to the individual at minimal or no cost. These documents must relate solely to the individual's personal information and may not include information of a personal nature about any other individual.

### **14. Handling Complaints about Personal Information**

#### 14.1 Initiating a complaint

Complaints about BCWBS's management of personal information may be instigated verbally or in writing and should be directed to the BCWBS Privacy Officer. Whether verbal or written, the complaint should follow the guidelines of the BCWBS Personal Information complaint form to ensure that the concern is documented thoroughly and with all relevant details. Initial complaints may be directed to members of staff, management, or to a representative of the Board of Directors who will pass them to the Privacy Officer.

#### 14.2 Investigating a complaint

Any person who may be named in the complaint may not investigate complaints.

- a) The Privacy Officer will investigate all complaints received. The Investigator will acknowledge receipt of the complaint promptly, and may contact the individual to clarify the complaint if necessary.
- b) The Investigator will be given access to all records, employees and others that handled the personal information or access request.
- c) Where the complaint is justified, the Investigator will take appropriate measure to rectify the situation, including correcting information handling practices and policies where necessary and communicating those changes to relevant staff and volunteers. The Investigator will follow up to verify that the required changes have been implemented.

- d) The Investigator will notify individuals of the results of an investigation clearly and promptly, informing them of relevant steps taken.
- e) The Investigator will record all decisions to ensure consistency in applying the Act.

#### 14.3 Requesting a review

Should an individual not be satisfied with the handling of their complaint, the Privacy Officer will inform them of the recourse they have to request a review by the Information and Privacy Commissioner of British Columbia. The Privacy Officer will provide the required contact information to a complainant wishing a review.

### 15. Providing Employment or Personal References

No member of the BCWBS management and staff or representative of the BCWBS Board of Directors may provide a personal or employment reference for an individual without the consent of the individual. In absence of consent, BCWBS will only confirm an employment; i.e. "yes, that individual worked/volunteered for us" or "no, that individual did not work/volunteers for us."

Consent is given by an individual's request to BCWBS for a written reference or for use of a BCWBS representative's name. In absence of such request from the individual, BCWBS or one of its representatives must have satisfactory confirmation of consent before providing an employment or personal reference. That confirmation may be a fax of a resume listing BCWBS or its representative as a referee. It is not BCWBS's responsibility to seek consent.

### 16. Collecting information without Consent

According to the Act, BCWBS may collect, use or disclose personal information without the consent of the individual. BCWBS will forgo obtaining consent on the following occasions:

- a) When collecting or disclosing the information clearly benefits you or is necessary for medical treatment and your consent cannot be obtained in a timely way.
- b) When information is needed for a proceeding or an investigation and getting consent might compromise the availability or accuracy of the information
- c) When the information is used for journalistic purposes and for no other purpose
- d) When the information is collected by observation at a competition or other public event in which the individual voluntarily participates
- e) When the information is necessary to determine the individual's suitability to receive an honour or award or be selected for athletic purpose.
- f) When the collection of information is required or authorized by law (such as criminal record checks)
- g) When the information is necessary to facilitate collection of a debt owed to BCWBS

### 17. Updating Privacy Policy and Procedures

The Privacy Officer will be responsible for answering questions about the BCWBS personal information policy and procedures. BCWBS will update its Privacy Policy and Procedures on a regular basis and provide information on changes in a timely way through Layout and the BCWBS web site.

### 18. Questions or concerns

If you have any questions or concerns about our privacy policy, please call us at 604-737-3138. Otherwise we will assume that we have your consent to continue to collect, use and disclose your personal information for the purposes identified above.

## **19. Review and Approval**

This policy was approved by the Board of Directors on September 26, 2005 and will be reviewed periodically by the Managing Director and/or Privacy Officer. This policy is based in part on the BC Wheelchair Sports Association Personnel Policy of which BC Wheelchair Basketball Society is a member sport.