



ARROWSMITH COMMUNITY JUSTICE SOCIETY

Personal Information Protection Act

Adopted: 9 Sep 2021

GUIDING PRINCIPLES:

The Board of Directors recognizes that individuals have a right to privacy and that ACJS has a responsibility to handle personal information appropriately. As a non-profit organization, ACJS is guided by the National *Personal Information Protection Act (PIPA)*¹ and *Personal Information Protection and Electronic Documents Act (PIPEDA)*² and as such, is responsible for ensuring the appropriate handling of all personal information under its control or custody.

DEFINITIONS:

1. “Personal information”

- a) Applies to any information about an identifiable individual. This can include: address, contact information, details of a referred case and/or detail of the progress of the case.
- b) Does NOT include:
 - i. business contact information
 - ii. any information that does not identify a person’s identity (e.g. male/female, youth/adult, etc)

PROCEDURE:

1. ACJS shall ensure that those acting on behalf of the organization are aware of the organization’s responsibility in relation to PIPA and that they will handle information with due consideration for each situation and the sensitivity of the information involved.
2. ACJS shall:
 - a) Collect, use and disclose information for legitimate and reasonable purposes only
 - b) Limit the collection of personal information to that which a reasonable person would consider necessary to fulfil the purposes of the organization This will include information collected for:
 - i. Volunteer selection and reference information
 - ii. Contact information of employees, volunteers, clients and their supporters.
 - iii. Evaluation data in reference to cases handled by them
 - c) Recognize the individual’s right to:
 - i. Know information is being collected and for what purpose
 - ii. Upon request, see and correct personal information held on file
 - iii. Make a complaint regarding the handling of their personal information
 - d) Respect the privacy of donors:
 - i. Keep records confidential
 - ii. Not exchange, rent or share its fundraising list

¹ See Appendix 5

² See Appendix 6

- e) Appoint a *Privacy Officer* with the specific responsibility to ensure that ACJS complies with PIPA requirements. The officer shall be the Program Coordinator. At any time that the privacy officer

or any clients shall request another person to handle a complaint, the Board Chairperson shall be the alternate *Privacy Officer*.

- f) The process for requesting a correction to the information will be as follows:
 - i. A formal request for correction will be reviewed by *Privacy Officer*
 - ii. If correction affects referral agent, they must be advised before any change can be made
 - iii. The client will be notified within 30 days of the outcome of the review and the steps taken
 - iv. The correction or application for change, in the case of a deemed invalid request, will remain with the file until it is destroyed

- g) The process for lodging a complaint will be as follows:
 - i. A formal complaint will be lodged with the *Privacy Officer*
 - ii. A time frame for completion will be set at 30 days from the receiving date
 - iii. The client will be advised as to the outcome of the complaint
 - iv. If client is not satisfied they will be referred to the Complaint Commissioner as per the process outline in PIPA.