



*The Lakes District Family Enhancement Society
offers programs & services referred to as The Link*

Data Protection and Privacy Policy

Policy 302.8

The Society is committed to protecting the privacy and security of its staff, volunteers, clients, donors and partners in compliance with the *BC Freedom of Information and Protection of Privacy Act*. The Society values the trust of its staff, clients and partners and recognizes that maintaining this trust requires that the Society be transparent and accountable in how they treat the personal information of its members, clients and donors.

This policy outlines standards for the collection, use and disclosure of personal information by the Society.

All employees, volunteers and board members have responsibility for ensuring that data is collected, stored and handled appropriately and in line with this policy. The Society's legal obligations to collect, store and handle data correctly are transferred by the board to the Executive Director.

Responsible Unit: ED

Approval: Board

Date: June 10, 2025

Procedures:

Data Collection

Personal information is any information about an identifiable individual collected in the course of the delivery of services.

The following general principles apply to the collection and use of participant information:

1. Personal information is only collected when it serves a legitimate and reasonable purpose and must be collected by fair and lawful means.
2. Participants need to provide informed consent for the Society to collect and use their personal information for a particular purpose. To this end, individuals collecting information should respectfully explain the purpose of collecting the information, how it will be used, and that all information is held in confidence.
3. Personal information should only be used for the purposes for which the information was collected unless consent is provided in writing for another use.
4. Individuals have the right to withdraw their consent at any time. They are informed of the implications of withdrawing their consent at the time of their request.

***For the Food Centre program, service will not be denied if the client refuses to disclose data.**

Consent

Consent refers to the process of giving informed signed permission for the collection, use and release of information. Consent is considered to be informed only if the individual understands the nature and consequences and the reasonably foreseeable benefits and risks of providing consent. It is the responsibility of the person with the authority to release the information to determine this capability.

Clients consent to have their personal information collected during orientation by intake staff. During orientation staff will:

1. use authentication measures to ensure valid consent,
2. ensure individuals have opportunity to have questions answered before and during participation,
3. ensure that clients understand what they are giving consent for. If there are concerns about an individuals' information processing capabilities, staff will give information slowly, respectfully and in easy-to-understand language,
4. ensure that all personal data is protected and stored securely,
5. ensure compliance with record-keeping standards.

Disclosure

Information will not be released to anyone other than the participant without the participant's written consent except under the following circumstances or conditions:

1. Information may be disclosed without consent of the participant to other volunteers, employees or board members deemed to have a legitimate need to know.
2. Compiled information regarding program or service attendance and results may be required by program funders. This type of data will not contain clients' personal information.
3. Information will be released without participant consent to persons in compliance with a judicial order or subpoena, or as required by federal or provincial legislation.
4. Information will be released without participant consent in an emergency, if the knowledge of that information is required to protect the health or safety of the participant or other persons.

In all other cases, participant information will be released to third parties only at the written request or consent of the participant. A participant may give informed consent from age 12 onwards.

NOTE: Prior to releasing information without consent or to third parties, individuals need to consult with the ED or designate or the president.

To protect the privacy and confidentiality of donors, the Society does not sell, rent, exchange or otherwise share its donor list.

Record Retention and Disposal

The Society is required to comply with the provincial mandate for organizations regarding the retention and disposal of all records. Each service may have unique requirements; hence a review of the mandates will be necessary prior to any disposal. All record maintenance will be handled as noted below. Record disposals must be vetted by the board appointed liaison.

1. Personal information and records of informed consent for all end users is required to be maintained in a secure site that protects confidentiality. Electronic files must be password protected, and paper files need to be kept in a locked location with limited access.
2. The Society retains personal information only for the duration it is needed. Once personal information is no longer required, it is destroyed promptly, safely and securely.
3. Based on the program specific disposal schedule, both paper and electronic file disposals will be conducted on a regular basis. Once approved by the Society President or designate, identified paper files will be shredded, and electronic files will be permanently erased. When a record is destroyed by effective shredding, burning, computer or video erasure it must be done so in a manner that ensures that the confidentiality of the information is maintained.

Transportation of Personal Information

Any personal information removed from the primary location must be contained in a locked case while being transported. Information should not be left unattended, and the case must be stored in a secure location.

All participant files that are transported electronically (via computer or any other electronic device) must be password protected. The electronic hardware or device being used for participant information needs to be stored in a secure location.

Sending participant information electronically also requires a password protection or coding process that ensures the protection of participant information and identification.

Responsible Unit: Board, ED, Designated Lead and Admin Team

Approval: Board

Processes:

All staff, volunteers and board members of the Society will:

1. ensure that clients are aware of and consent to the use and storage of their personal information,
2. provide a private area to conduct client intake and/or conduct any conversations with clients where personal information is discussed,
3. use discretion in discussing all matters, both professional and personal, related to the Society,
4. ensure that all matters and information pertaining to the staff, volunteers, clients, donors and the board that has been gained within the organization are treated as confidential,
5. secure shared personal and business information as set out above.

Practices:

All employees, volunteers and board members of the Society will receive training during orientation to ensure that they understand the above policy and their responsibilities when handling data and personal information.

The board will review the ***Data Protection and Privacy Policy 302.8*** annually to ensure that it is meeting its legal obligations.

Updated policies and procedures will be posted publicly on The Link website at <https://thelink-ld.ca/>.

Responsible Unit: ED, Designated Lead and Admin Team

Approval: Board