



St. Timothy's Anglican Church
Agincourt, Ontario Canada

Privacy Standards Policy

Purpose

St. Timothy's, Agincourt has a Privacy Standards Policy, applicable to all individuals, lay or ordained, paid or unpaid, who serve at St. Timothy's Anglican Church, Agincourt, under the jurisdiction of the Bishop of Toronto, to ensure the proper collection, retention and distribution of personal information.

Collection

The Administrative Office of St. Timothy's, Agincourt has a centralized record management process for the collection, management, retention and disposition of personal information. Information about clergy, employees and many volunteers is located in our central database. Congregational information is contained and stored in our central database. The Envelope Secretary and Administrator manage all donor record information. All personal information is the property of the Incorporated Synod of the Diocese of Toronto and all individuals have controlled access to their personal information.

Definition

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. Personal information does not include the name, title or business address or telephone number of an employee of an organization. Personal information includes information in any form, such as: home address and home phone number, age, marital status, family members' names, employee files, identification numbers, ethnic origin, evaluations, disciplinary actions, the existence of a dispute, opinions, comments, social status, income, credit records, donation information, loan records or medical records.

Principles

St. Timothy's, Agincourt will follow the ten principles for handling personal information as set out in Schedule 1 to the Personal Information Protection and Electronics Document Act of Canada.. These principles are: accountability, identifying purposes, consent, limiting collection, limiting use, disclosure and retention, accuracy, safeguards, openness, individual access, and provision of recourse as listed on pages 3 and 4.

Accountability

The Incumbent, after consultation with the Corporation and Advisory Board, will designate a person to be the Privacy Officer for the Parish. Staff and Congregation must be informed of the name and responsibilities of the Privacy Officer. The Privacy Officer will report to the Incumbent for discussion on an annual basis in regard to any

activities related to personal information protection. The Privacy Officer will ensure regular training for staff/volunteers as to the policies and procedures personal information protection requires. The Policy will be reviewed annually the Privacy Officer, in consultation with the Privacy Committee. Employees will be made aware of the importance of maintaining the security and confidentiality of personal information. The misuse or improper handling of personal information may result in disciplinary action up to and including dismissal.

Each committee will assign one person responsible for ensuring the standards are maintained. Each committee must follow the procedures for collection, retention and distribution listed below and assign personal information to one of the three levels:

Level 1 – Highly Restricted

Level 2 – Confidential

Level 3 – General Information

Level 1- Highly Restricted

Criteria

Information is very sensitive and if shared inappropriately has the potential of damaging people's lives and/or their well being and could bring about legal action against the parish. The information is used for internal decisions, identifies donor designations, and legal action.

Examples

- Donor name and amount, financial and bank information
- Legal documents that contain personal information
- Disciplinary documentation
- Compensation information such as social insurance number, wage amounts

Collection

1. Collect personal information only for a specific purpose and limit the amount and type of information gathered to what is necessary for the identified purposes.
2. Advise the individual of the purposes for which information will be used or disclosed, at or before the time of information collection. This may be done orally or in writing. Whether consent is granted or denied orally, a follow-up letter must be issued to confirm in writing that the records reflect the individual's wishes. A copy of the letter will be kept on file.
3. Consent must also be obtained again when collected information might be used for another purpose.

Retention

See policies and procedures

Level 2- Confidential

Criteria

Information is somewhat sensitive and if shared inappropriately could bring about embarrassment to an individual and/or the parish, or it may bring about legal action against the diocese. The information is used for parish operations and considered private, but more individuals have access to it than Level 1.

Examples

- Appointment Letters
- Performance Reviews
- Leaves of absence and disability
- Residential phone numbers and addresses
- Complaints
- Parish files
- Compensation information

Collection

1. Collect personal information only for a specific purpose and limit the amount and type of information gathered to what is necessary for the identified purposes.
2. Advise the individual of the purposes for which information will be used or disclosed, at or before the time of information collection. This may be done orally or in writing. Whether consent is granted or denied orally, a follow-up letter must be issued to confirm in writing that the records reflect the individual's wishes. A copy of the letter will be kept on file.
3. Consent must also be obtained again when collected information might be used for another purpose.

Retention

See policies and procedures

Level 3- General information

Criteria

Information is not sensitive and can be shared. This information is not restricted and many can have access to it. It is collected to assist the committees in the accomplishments of their tasks. There is no confidential or restricted personal information included in this level.

Examples

- Reference files
- Forms
- Board and Committee Minutes
- Annual Reports
- Legislations and Policies

Collection

Personal information is not to be collected in this category.

Retention

Keep information only as long as is necessary to satisfy the purposes.
Safeguard from unauthorized access to ensure information is not modified or lost.

Distribution and Individual Access

Information can be shared publicly

St. Timothy's Anglican Church Agincourt: Privacy Policies and Procedures

History:

The need for establishing privacy policies was established at several Advisory Board meetings. The Federal government set out ten principles for handling personal information in schedule 1 of the Personal Information Protection and Electronics Document Act of Canada. The General Synod of the Anglican Church of Canada followed these ten principles in their privacy policies and procedures. The Anglican Diocese of Toronto further adapted the ten principles to meet the needs of the diocese.

The Ten Principles:

1. Be Accountable
2. Identify the Purpose
3. Obtain Consent
4. Limit the Amount and Type of Information Collected
5. Limit the Use, Disclosure and Retention of Personal Information
6. Be Accurate
7. Use Appropriate Safeguards
8. Be Open
9. Give Individuals Access
10. Provide Recourse

At the February 15, 2017, meeting of the Advisory Board, it was decided to form a committee of three to create a draft of privacy policies and procedures for St. Timothy's Anglican Church Agincourt to be presented at a later date. Shauna van Hoof volunteered to chair this committee along with Shirley Godwin. A notice in the bulletin prompted June Cooke to join this committee.

The following ten principles outlined by the General Synod Privacy Document have been adapted for the needs of our parish:

Policies:

1. **Be Accountable:** The Advisory Board created a Privacy Committee to comply with diocesan policies and procedures and to develop and implement personal information policies and practices for St. Timothy's Anglican Church, Agincourt.
2. **Identify the Purpose:** A review of all information holdings was completed in order to ensure that each is required for a specific purpose. Each person shall be notified individually either orally or in writing of these purposes. All obtained consents and purposes are stored in an easily accessible place for reference if an individual should request an account of such information.
3. **Obtain Consent:** Each individual should have an opportunity to review and up-date his/her personal information and the specific purposes for which it was intended. Consent is obtained at the time of collection or before, as well as, when a new use is identified. Express consent is to be used whenever possible and especially when personal information is considered sensitive.
4. **Limit Collection:** We clearly identify and clarify the purposes for which we require information, as well as ensure that staff and volunteers can explain why certain information is needed. Private information records will be retained for 7 years and personal information records will be updated bi-annually.
5. **Limit Use, Disclosure and Retention:** Information that has been collected for a specific purpose or that no longer fulfills its intended purpose is disposed of in a way that prevents improper access. For example, electronic records are deleted and erased from all hard drives, paper files are shredded. Inactive files are kept in a separate file and stored electronically at St. Timothy's. Information that is collected for a new purpose is recorded and stored in a safe place.
6. **Be Accurate:** Information should be as accurate, complete and up-to-date as possible and should take into account its use and the interests of the individual.

7. Use Appropriate Safeguards: Review and up-date security measures regularly taking into account the following factors: - sensitivity of the information - amount of information - extent of distribution - format (e.g. paper or electronic) - type of storage
8. Be Open: Staff and volunteers are informed of the policies and practices/procedures for the management of personal information.
9. Give Individual Access: When requested, inform individuals of any personal information on file including how it is or has been used. Individuals are to have access to their personal information. Corrections will be made if the accuracy and completeness of the information is challenged and found to be deficient.
10. Any complaints will be made in writing and given to the Privacy Officer to review, investigate and to make corrections to the information-handling practices and procedures found deficient.
11. Exceptions to the Consent Principles: St. Timothy's Anglican Church Agincourt may collect and use personal information without consent in an emergency that threatens an individual's life, health or safety. It may also use personal information without consent if it is publicly available.

Practices/ Procedures:

1. Initial form of consent to be completed. Thereafter, an annual review of all parish members' personal information is conducted. A simple form requesting the name, address, telephone numbers and e-mail addresses as well as permission to take photos is given to the parishioner. The form should include any purposes for reviewing the information and the uses for which the information is intended. The form should also include a section where the individual may identify any information that is not to be shared. Each form contains a signed statement of consent so that personal information and photographs can be shared as out-lined by the individual. (See Appendix A.)
2. A Newcomer Form has been created that invites each guest to complete the form. Forms should be handed out at the discretion of clergy and staff and returned to the office coordinator. (See Appendix B.)
3. Information should be collected with volunteers over a period of a few Sundays and given to the Office Coordinator to up-date and correct existing files. All obsolete files should be subsequently deleted or shredded as is appropriate.
4. Newcomer information should be added to the files as soon as it becomes available.

5. Financial information collected for a specific event or purpose (diocesan or parochial) must be disposed of by shredding or deleting if the purpose is no longer relevant.
6. **Personal information cannot be given out over the telephone, in electronic form, written form or in person without individual consent from each person.**
7. Prayer Lists: Before adding any names to the prayer list, each individual must be asked if it is permissible to do so. Individuals may prefer first names only, a middle name only, or use of the full name. It is extremely important that the reason for the prayer request be handled with discretion and compassion. Some individuals may wish to protect their privacy and not disclose information to anyone but the clergy or other trusted individuals. The prayer list and names of the deceased should be blacked out (or not included) on any electronic communication.
8. Newsletter: Parishioners are encouraged to receive the newsletter electronically for reasons of healthy stewardship and efficiency. Parishioners who do not have access to a computer may still wish to receive their newsletters by mail or hand delivery. Individuals should have the option of unsubscribing to the electronic newsletter if they wish.
9. Announcements: It is also recommended that parishioners receive important announcements such as the notification of funerals and special events electronically, as this is a reliable and timely way of communicating.
10. Any e-mails sent out must use the option to hide the e-mail address to protect privacy of individual information.
11. Privacy Statement: St. Timothy's Anglican Church Agincourt protects the privacy of individual personal information by requesting permission or consent for the use of the information for different purposes. Any privacy concerns may be directed to the Privacy Officer in writing. The committee will respond to all concerns in a timely fashion. Each individual may request access to their information file at any time.
12. The Privacy policies and practices are posted in the Office and Narthex. All staff and parishioners in leadership positions must be made aware of these policies. A signed form stating that each staff member or lay volunteer has read and understood the policies and practices is kept on file in the Office and reviewed tri-annually. (See Appendix C.)
13. The Privacy Statement should be visible in each newsletter and bulletin to ensure that parishioners are aware of the Privacy Policies and Procedures of St. Timothy's Anglican Church, Agincourt.

14. E-mails especially those with attachments sent to members of the parish should include the following statement:

Confidentiality Notice: This email and attached material are intended for the use of the individual or organization to whom they are addressed and may not be distributed, copied or disclosed to other unauthorized persons in accordance with the Freedom of Information and Protection of Privacy Act and other relevant law.



St. Timothy's Anglican Church, Agincourt

Appendix A

Parish Member Personal Information Form

The information on this form is being collected for the following possible purposes:

- Parish List
- Communications (Mail and Electronic)
- Birthdays and Anniversaries

Please print.

Adult One in Household Birthdate: (dd-mmm-yyyy) _____

Name (Title, First and Last Name): _____

Address (Street Name & Number): _____

Telephone Number: _____ - _____ - _____ Apartment Number: _____

Business Number: _____ - _____ - _____ Ext. _____ City: _____

Cell Number: _____ - _____ - _____ Postal Code: _____

E-mail Address: _____ Occupation (Optional): _____

Baptized? Yes/No Confirmed? Yes/No

Emergency Contact Name/Phone#: _____

Adult Two in Household Birthdate: _____

Name: _____ Address: _____

Title First Name Last Name (Street and Number)

Telephone Number: _____ - _____ - _____ Apartment Number: _____

Business Number: _____ - _____ - _____ Ext. _____ City: _____

Cell Number: _____ - _____ - _____ Postal Code: _____

E-mail Address: _____ Occupation: _____

Emergency Contact Name/Phone#: _____ Baptized? Yes/No

Confirmed? Yes/No

Children (Under 18 years of Age)

Child's Full Name: _____ Birthdate: _____ Baptized? Yes/No

Child's Full Name: _____ Birthdate: _____ Baptized? Yes/No

Child's Full Name: _____ Birthdate: _____ Baptized? Yes/No

Service most frequently attended by family: (circle all that apply) 8 AM 10 AM Praise & Worship

Please check off which of the following information you do not wish to be shared:

_____ E-mail Address _____ Home Address _____ Telephone Number
_____ Business Number _____ Cell Number _____ Last Name (Prayer List)
_____ Children's Names]]

Photographs are taken at many of our parish events. If you do not wish your picture to appear in any of our church publications or on our website, please let us know by checking the box below. Your request will be treated in confidence and every reasonable effort will be made to ensure that your request is honoured.

_____ Please do not use my image in parish publications.

- I agree to share my personal information with the clergy and staff so that they can contact me and send me e-mails of Notices and Letters.

Signature of Consent to Share Personal Information: _____

Date: _____

Privacy Statement

St. Timothy's Anglican Church Agincourt protects the privacy of individual personal information by requesting individual permission or consent for the use of the information for different purposes. Any privacy concerns may be directed to the Privacy Committee in writing. Each individual may request access to their information file at any time.



St. Timothy's Anglican Church, Agincourt

Appendix B

Newcomer Personal Information Form

Welcome to St. Timothy's! We invite you to share with us your personal information for the following possible purposes:

Parish List

- Communications (Mail and Electronic)
- Birthdays and Anniversaries

Please print.

Adult One in Household Birthdate: *(dd-mmm-yyyy)* _____

Name: _____ Address: _____

Title First Name Last Name (Street and Number)

Telephone Number: _____ - _____ - _____ Apartment Number: _____

Business Number: _____ - _____ - _____ Ext. _____ City: _____

Cell Number: _____ - _____ - _____ Postal Code: _____

E-mail Address: _____ Occupation: _____

Emergency Contact Name/Phone#: _____ Baptized? Yes/No

Confirmed? Yes/No

Adult Two in Household Birthdate: _____

Name: _____ Address: _____

Title First Name Last Name (Street and Number)

Telephone Number: _____ - _____ - _____ Apartment Number: _____

Business Number: _____ - _____ - _____ Ext. _____ City: _____

Cell Number: _____ - _____ - _____ Postal Code: _____

E-mail Address: _____ Occupation: _____

Emergency Contact Name/Phone#: _____ Baptized? Yes/No

Confirmed? Yes/No

Children (Under 18 years of Age)

Child's Full Name: _____ Birthdate: _____ Baptized? Yes/No

Child's Full Name: _____ Birthdate: _____ Baptized? Yes/No

Child's Full Name: _____ Birthdate: _____ Baptized? Yes/No

Service Most Frequently Attended: 8:00 /10:00 OR Praise & Worship

[[Is there any of the following information that you do not wish to be shared:

_____ E-mail Address _____ Home Address _____ Telephone Number
_____ Business Number _____ Cell Number _____ Last Name (Prayer List)
_____ Children's Names]]

Photographs are taken at many of our parish events. If you do not wish your picture to appear in any of our church publications or on our website, please let us know by checking the box below. Your request will be treated in confidence and every reasonable effort will be made to ensure that your request is honoured.

_____ Please do not use my image in parish publications.

Preferred Mailings: Email / Surface Mail

Previous Faith Community: _____

What brought you to St. Timothy's? _____

What gifts/talents do you have? Are there any Church Committees/Groups that interest you? _____

- I agree to share my personal information so the clergy and staff can contact me, send me e-mails of Notices and Letters.

Signature of Consent to Share Personal Information: _____

Date: _____

Privacy Statement

St. Timothy's Anglican Church Agincourt protects the privacy of individual personal information by requesting individual permission or consent for the use of the information for different purposes. Any privacy concerns may be directed to the Privacy Committee in writing. Each individual may request access to their information file at any time.



St. Timothy's Anglican Church, Agincourt

Appendix C

Agreement Form for the Privacy Policies and Procedures for St. Timothy's Anglican Church, Agincourt

To be used in Conjunction with the Anglican Diocese of Toronto Police Screening process to be completed every three years.

I have read the Privacy Policies and Procedures, and agree to adhere to the procedures given in the Privacy documents for St. Timothy's Anglican Church, Agincourt.

Signature of Agreement (Staff or Lay Minister/Volunteer): _____

Print Full Name: _____

Date: _____

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