



CHRIST
central
church

STANDARD

Title:

Responsibility of:

Prepared by:

File:

Number:

Date Effective: 2019.05.31

Privacy of Information

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Janet Norman

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Introduction:

The Meeting Place Inc. (operating as Christ Central Church, herein referred to as "Church") is committed to protecting the privacy of its members, adherents, donors, volunteers, staff, employees, Directors, Elders, officers, ministry leaders and any other persons about or from whom the Church collects personal information. This document provides the standards of practice for privacy to which the Church is expected to comply, in accordance with Church Policy POL-203.

Articles:

A. Accountability

1. The Church is responsible for maintaining and protecting personal information under its control.
2. The Church's Privacy Officer is responsible to ensure that the Church complies with its privacy obligations in accordance with applicable privacy laws and with this Standard. This includes managing the policy, monitoring compliance, and responding to complaints regarding the collection, retention, and use of personal information. The position of Privacy Officer is held by the Church Administrator.

B. Identifying Purposes

1. The Church collects and uses personal information for a variety of purposes including, but not limited to:
 - a. providing services to individuals ministered to by the Church;
 - b. establishing and maintaining members lists;
 - c. managing payroll and benefits;
 - d. employee performance evaluations; and
 - e. establishing and maintaining lists of donors and issuing donation receipts.
2. The Church shall identify and explain the purposes for which it collects personal information to the person from whom the personal information is being collected before, or at, the time the information is collected.

C. Consent

1. Consent shall be obtained from each person whose personal information is collected, used and disclosed, unless obtaining the consent would be inappropriate or not required by law.
2. A person's consent for the Church to collect and use personal information may be implied by virtue of their membership in the Church or because of the person's conduct within the Church.
3. When it is appropriate, written consent for the Church to collect and use personal information shall be obtained by the Church and maintained in Church files. Information may be collected by use of the "Christ Central



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Church Personal Information Form" (Appendix C). Completed forms must be submitted to the Church Office Administrator.

4. The Church occasionally communicates through general emails sent to many recipients. These emails will provide recipients a non-cumbersome way to withdraw their consent, in order to avoid receiving similar messages from the Church in the future.

D. Limiting Collection

1. Information collected shall be limited to that required for the purpose or purposes identified by the Church.
2. The Church shall collect personal information in a fair, open and lawful manner, without deceit.

E. Limiting Use, Disclosure and Retention

1. Personal information collected by the Church shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the person or as required by law.
2. All collected personal information shall be destroyed, erased or made anonymous as soon as the purpose for which it was collected is no longer relevant, or in accordance with the Record Keeping Policy POL-216, or as permitted by the law. Care shall be taken when the information is being disposed of to prevent unauthorized parties from gaining access to it.
3. This Privacy Policy does not prohibit the Directors, Elders, managers, officers or employees from collecting, retaining and using information related to individuals ministered to by the Church, since such information assists the Church in providing quality services to members, adherents and others.

F. Accuracy

1. Personal information collected by the Church shall be maintained in as accurate, complete and up-to-date a form as necessary in order to fulfill the purposes for which it was collected.

G. Safeguards

1. Personal information collected by the Church shall be protected by security safeguards that are appropriate to the sensitivity of the personal information.
2. Safeguards may include:
 - a. physical measures, such as locked filing cabinets and premises security;
 - b. organizational measures, such as restricted access to files with personal information; or,
 - c. technological measures, such as security software, passwords, etc.

H. Openness



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1. Information regarding the Privacy Policy of the Church and the management of personal information that is collected shall be made available upon request.
2. Such information shall include:
 - a. the name and contact information of the Privacy Officer
 - b. means of gaining access to one's own personal information held by the Church
 - c. copies of or access to documents that explain the Church's privacy policy, standards, codes, guidelines and/or procedures.
- I. Access to Personal Information**
 1. Access to personal information shall be granted, where the Church is legally required to release the information and provided that the disclosure does not violate any applicable statutes or contracts, to the person to whom the information pertains and where there is an appropriate written request.
 2. The existence, disclosure and use of the personal information shall be granted within a reasonable period of time.
 3. Any inaccuracy or incompleteness of the personal information shall be amended as required.
- J. Challenging Compliance**
 1. Complaints or inquiries about the collection, use, disclosure or retention of personal information and the Church's compliance with this Policy shall be directed to the Privacy Officer.
 2. The Privacy Officer shall investigate complaints and ensure that appropriate measures are taken.
 3. Complaints against the Privacy Officer shall be directed to a Church Director.

Reference:

Canadian Council of Christian Charities, Sample Privacy Policy, http://www.cccc.org/members_topic_show/privacy#samples [accessed May 14, 2019].

Canadian Council of Christian Charities, "Must Have" Policies, https://www.cccc.org/bulletin_article/160, [accessed April 30, 2019].

Certified Information Privacy Professional Guide, Canadian Standards Association Model Code for the Protection of Personal Information, <https://www.cippguide.org/2010/06/29/csa-model-code/>, [accessed April 22, 2019].

Certified Information Privacy Professional Guide, Generally Accepted Privacy Principles, <https://www.cippguide.org/2010/07/01/generally-accepted-privacy-principles-gapp/>, [accessed April 27, 2019].

Church Privacy Policy POL-203



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Government of Canada, Personal Information Protection and Electronic Documents Act (PIPEDA) S.C., 2000, c.5, <https://laws-lois.justice.gc.ca/eng/acts/P-8.6/page-1.html> [accessed April 22, 2019].
Office of the Privacy Commissioner of Canada, December 2015, A Guide for Businesses and Organizations: Privacy Toolkit, https://www.priv.gc.ca/media/2038/guide_org_e.pdf [accessed April 29, 2019].

Appendix 1 Personal Information Privacy Commitment Statement

Appendix 2 Definitions

Appendix 3 Christ Central Church Personal Information Form

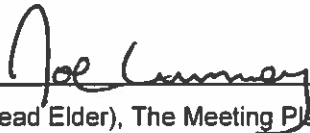
Contact:

Church Office

140 Clark St, Fredericton, NB, E3A 2W7

(506) 474-1603

office@christcentral.ca


President (Lead Elder), The Meeting Place Inc.


Director, The Meeting Place Inc.



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APPENDIX 1

Personal Information Privacy Commitment Statement

In accordance with applicable laws, The Meeting Place Inc. operating as Christ Central Church (hereafter Church) is committed to protecting the privacy of its members, adherents, donors, volunteers, staff, employees, Directors, Elders, officers, ministry leaders and any other persons about or from whom the Church collects personal information. The Church embraces the principles of the Canadian Standards Association Model Code for the Protection of Personal Information to ensure that all personal information is properly collected and is disposed of in a safe and timely manner when no longer required.

In being, or becoming, a member or adherent of the Church, it is recognized by all such individuals that the Bible portrays believers as members of one body (see I Corinthians 12). This requires the sharing of personal information within the body. The Church, its members and adherents, by voluntary implied contract, submit to, and are bound by, the Church By-Laws and other approved governing documents of the Church.

Except for all the above implied consent to collect, use and retain personal information, no personal information will be sold, rented, leased or otherwise made available to any person without the explicit consent of the member or adherent. Except as otherwise required by the Church By-Laws or other governing documents of the Church or the operation of law, every member and adherent has the right, at any time, to withdraw his or her implied or explicit consent for the use of his or her personal information for any or all previously authorized uses.

With respect to the privacy of personal information, the above means that all members and adherents have given their implied consent to use their personal information for all internal purposes of the Church to the extent that such use is in agreement with the Church By-Laws, Constitution or other governing documents and the pronouncements of the Church from time to time.

Other persons or organizations, who act for or on behalf of the Church are required to comply with the Privacy Policy and principles and will be given restricted access to personal information solely to perform the services they may be retained to perform for the Church.



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APPENDIX 2

Definitions

Attendee (noun):

- a. a person who is present on a given occasion or at a given place
(<http://www.merriam-webster.com/dictionary/attendee>)
- b. a person who is present at a specific time or place (<http://dictionary.reference.com/browse/attendee>)

In the context of the Church, an attendee describes one who chooses to attend any Church event or chooses to participate in any Church ministry (regardless of location) for any reason. Although the term includes those who are adherents and members, the term attendee is broader and also refers all those who are present for single or multiple time(s)/occasion(s).

Adherent (noun):

- a. a person who follows or upholds a leader, cause, etc.; supporter; follower.
(<http://dictionary.reference.com/browse/adherent>)
- b. connected or associated with especially by contract
(<http://www.merriam-webster.com/dictionary/adherent>)
- c. a supporter, as of a cause or individual
(<http://www.thefreedictionary.com/adherent>)

In the context of the Church, an adherent is one who actively participates in the life, ministry and relationships of the Church in a manner similar to a Church member, but who has not formally committed to or fulfilled the specific requirements of becoming an official recognized member as defined by the Church By-Laws, Constitution or other governing documents. The line between an adherent and a frequent attendee may not always be easy to discern. Typically an adherent may be discerned by tangible expressions of the individual that are recognized by Church leadership, such as following Church teaching and doctrines and being involved through relationships and through supporting the life and ministry of the Church by regular financial giving, volunteering personal time or making other contributions. The Church has no formal list or other means of officially identifying adherents. For the purpose of this Privacy Policy, the definition of an individual as an adherent will be at the sole discretion of the Elders and Directors, by consensus.

Member:

Membership in the Church is defined in Church By-Laws, Constitution or other governing documents.

Personal information:

Includes, but is not limited to gender, name, address, date of birth, marital status, contact information, ID issue and expiry date, financial records and allergies and medical information.



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APPENDIX 3

CHRIST CENTRAL CHURCH PERSONAL INFORMATION FORM

Individuals providing personal information to Christ Central Church (Church) should read and understand the Church Privacy Policy and the Church Privacy Standard prior to collection of personal information. The Church will record, store, use and update the personal information collected herein in accordance with the Church Privacy Policy and Standard. The Church will administer its Privacy Policy and Standard with due diligence and enforce such to the extent it is within its control. Disclosure of personal information in keeping with the stated purpose for the information collected to volunteers or participants in church activities may be part of the appropriate use of certain personal information. The Church cannot fully control or enforce the use or abuse of such personal information by such volunteers or participants.

MINISTRY:

REASON FOR RECORDING OF PERSONAL INFORMATION: (state intended use and exposure to others)

PERSONAL INFORMATION REQUESTED:

Name:

Address

Telephone:

Email:

(list other data fields as required...)

CONSENT:

If new information is required or if the purpose for the use of personal information changes, prior consent of the individual must be obtained on a new Church Personal Information Form.

If the information provided herein changes, the individual from whom the information is collected is responsible for providing an update to the Church for records to remain current. Updates shall be provided on a Church Personal Information Form. Completed forms are to be submitted to the Church Office Administrator.

I have read and understand the Church Privacy Policy and Standard and the information presented on this form. I hereby provide consent for the Church to collect and use my personal information.

Print Name: _____

Signature: _____

Date: _____



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Revision Number	Revised Section(s)	Revision Summary	Revised By:	Effective Date:	Review Cycle
0	NEW	Original Issue	K. Calhoun	2009.09.23	2 Years
1	Appendix 2 References	Definition of 'Personal Information' included. Checked and updated domain links.	S. Lyndon	2012.07.30	2 Years
2	All	Replacing 'TMP' with 'CCC'. Changed Logo to Christ Central Church	S. Lyndon	2012.10.25	2 Years
3	-	Replaced CC with Church; minor updates to form in Appendix 3	K. Calhoun	2014.12.05	2 Years
4	All	Minor wording changes. Added article C.4. Replaced "The Meeting Place Inc." with "Church". Added ministry leaders, staff, and Elders to the Introduction and Appendix A. Changed the term "data" to "information." For further clarity: personal information forms collected under Article C.3 can be submitted to the Office Administrator by the individual completing the form or by the ministry leader.	J. Norman	2019.05.31	2 Years