



Gladue Services Department Personal Information Protection Policy

The Gladue Services Department (GSD) is committed to providing our clients and the Indigenous communities we serve with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, protecting this information is our highest priority. The GSD values the trust our clients and community partners, along with the public trust, and recognize that maintaining this trust requires that we be transparent and accountable in how personal information is gathered and maintained.

In accordance with the *BC Personal Information Protection Act* (PIPA), the GSD will inform clients of why and how their personal information is collected, used, and disclosed. The GSD will obtain consent where required, and handle personal information in a manner that consistent with PIPA.

The GSD Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices the GSD will follow in protecting clients' personal information. This privacy commitment includes ensuring the accuracy, confidentiality, and security of client's personal information, while prioritizing client consent for access and use of any personal information.

Scope of this Policy

This Personal Information Protection Policy applies to the Gladue Services Department and all employees, contractors therein. Additionally, it applies to all external users of the Gladue Information Management System (GIMS).

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of the GSD.

Definitions

Personal Information – the information gathered about an identifiable *individual*, including, but is not limited to, such things as an individual's name, address, birth date, e-mail address, and phone number. Personal information does not include contact information (described below).

Contact information – information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – the individual within the GSD that has the designated responsibility for ensuring that the Gladue Services Department complies with the Personal Information Protection Policy and PIPA.

Director of Gladue Services – the individual responsible for the administration and oversight of the Gladue Services Department, along with the enforcement of the Personal Information Protection Policy.

Collecting Personal Information

- 1.1 For the purposes of all services offered, the GSD will communicate the reasons for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 The GSD will only collect client information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To open and manage a client file,
 - To deliver requested services,
 - To provide Gladue Report services,
 - To understand the needs of our clients
 - To enrol the client in a program,
 - To ensure a high standard of service to our clients and
 - To meet regulatory requirements.

Using and Disclosing Personal Information

- 2.1 The GSD will only use or disclose client personal information where necessary to fulfill the purposes identified at the time of collection, or for a purpose reasonably related to those purposes such as:
 - To conduct client surveys in order to enhance the provision of our services.
 - To contact our clients, customers, members directly about services that may be of interest.
- 2.2 The GSD will not use or disclose client personal information, for any additional purpose unless consent to do so is obtained.
- 2.3 The GSD will not sell client, lists or personal information to other parties.

Retaining Personal Information

- 3 The GSD will retain client files and personal information, only as long as necessary to fulfill the identified purposes related to the delivery of GSD services.

Ensuring Accuracy of Personal Information

- 4.1 The GSD will make reasonable efforts to ensure that client personal information is accurate and complete where it may be used to make a decision about the client, or disclosed to another organization.
- 4.2 Clients may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing to the GSD and provide sufficient detail to identify the personal information and the correction being sought.
- 4.3 If the personal information is demonstrated to be inaccurate or incomplete, the GSD will correct the information as required and send the corrected information to any organization to which the GSD disclosed the personal information in the previous year. If the correction is not made, the GSD will note the clients' correction request in the file.

Securing Personal Information

- 5.1 The GSD is committed to ensuring the security of client, personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal, or similar risks.
- 5.2 The following security measures will be followed to ensure that client personal information is appropriately protected: the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate (i.e., only those that need to know will have access and contractually requiring any service providers to provide comparable security measures.)
- 5.3 The GSD will use appropriate security measures when destroying client's, personal information such as shredding documents, and deleting electronically stored information.
- 5.4 The GSD will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Providing Clients, Access to Personal Information

- 6.1 Clients, have a right to access their personal information, subject to limited exceptions, as dictated by PIPA.
- 6.2 A request to access personal information must be made in writing to the GSD and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer or Director of Gladue Services.
- 6.3 Upon request, the GSD will explain how the GSD client files and personal information is used and to whom it has been disclosed, if applicable.
- 6.4 The GSD will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

6.5 If a request is refused in full or in part, the GSD will notify the client, in writing, providing the reasons for refusal and the recourse available to the client.

Questions and Complaints: The Role of the Privacy Officer or designated individual

7.1 The Privacy Officer and Director of Gladue Services are responsible for ensuring the Gladue Services Department is in compliance with this policy and the *Personal Information Protection Act (PIPA)*.

7.2 Clients should direct any complaints, concerns or questions regarding GSD compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Gladue Services Department Director of Gladue Services

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