

Privacy Policy

At the Esquimalt Military Family Resource Centre (MFRC) your privacy is very important to us. We strive to create an environment where you feel safe and supported. That is why protecting your confidentiality and privacy is of vital importance to us. This information summarizes the privacy policy and practices of the Esquimalt MFRC.

Purpose

To ensure that all information obtained from clients is treated with respect and that it is used only within the context authorized by the individual giving the information.

Policy Statement

All staff and volunteers are to ensure that the collection and use of personal information is handled in accordance with both the Director Military Family Services - MFSP Parameters for Practice (click the MFSP Parameters for Practice - reference page 18) and the provincial Personal Information Protection Act (PIPA) as outlined in the MFRC Privacy Policy Plan.

How we respect your privacy

We respect your privacy in many ways:

During your visit to our website, the MFRC does not automatically gather any specific personal information from you (or your computer) such as your name, phone number or email address. If you provide us with your email address, such as when you send an email request, we use that information to respond to your message with the information you may have requested and not for any other purpose.

At any point of personal information collection you will be asked for your consent to collect your information, and you will be informed of the purpose for which it is being collected and how to exercise your right of access to that information.

MFRC Confidentiality: Information Collection and Use

The MFRC only collects the personal information that is necessary to provide the information or services requested by the individual. For children and youth programs in particular, much of the information requested for program registration e.g. Daycare, Preschools, Out of School Care etcetera is required for both the Child Care Licensing Regulations and to provide the best standard of care for your children. All information is kept confidential and will only be released as required for the safety of children (for example, medical emergencies) or as required by law as outlined under PIPA (see part six, point 18).

We will not provide any information of a personal or confidential nature to any person or organization without your explicit permission.

We are not required to report the names of program participants to any Canadian Forces authority.

Participation/utilization of our programs will not negatively affect your career.

For counselling related programs/services we do not discuss your case files with anyone unless you have given us explicit permission to do so

The information gathered will allow us to provide a higher level of service and support to and for the client, and you as the client have asked us to assist you in obtaining a higher level of service

It is required by law as outlined under PIPA (see part six, point 18).

Privacy Principles

To respect each individual's privacy, and to achieve the privacy goals and objectives of the MFRC, we have adopted and adhere to the ten privacy principles that are outlined in both Director Military Family Services - MFSP Parameters for Practice and PIPA.

There are ten (10) Principles to Our Privacy Policy. We have expanded upon the principles below to explain how these principles relate to the collection, use, disclosure and protection of personal information.

Principle 1 Accountability

The MFRC is accountable for maintaining and protecting personal information it has collected. In compliance with PIPA, a Privacy Officer has been designated to ensure MFRC's compliance with the principles described in the MFRC Privacy Policy.

Principle 2 – Identifying Purposes

The MFRC will identify the purposes for which personal information is collected at or before the time the information is collected. Identifying the purposes for which personal information is collected at or before the time of collection allows the MFRC to determine the information it needs to collect so it may fulfill these purposes. The identified purposes will be specified at or before the time of collection to the individual either orally or in writing on the program's registration form. When personal information that has been collected is to be used for a purpose not previously identified, the new purpose shall be identified before use. The consent of the individual is required before personal information can be used for that purpose, unless the use of that new information is permitted by law under PIPA (see part six, point 18).

Principle 3 – Consent

The informed consent of the individual is required for the collection, use, or disclosure of personal information, except as permitted by law under PIPA Section 18 or for security reasons. Click here for more information about this (see part 3, point 6). The MFRC defines informed consent as consent given by an individual after they are made aware, orally or in writing, and gain knowledge of the exact purposes for the collection and use of their personal information.

Principle 4 – Limiting Collection

The collection of personal information shall be limited to only that which is necessary for the purposes identified by the MFRC. Information shall be collected by fair and lawful means. The MFRC will only collect personal information for purposes that a reasonable person would consider appropriate in the circumstances. The MFRC will inform the individual of the purposes for collecting and obtaining consent at or before the time of collection.

Principle 5 – Limiting Use, Disclosure and Retention

The MFRC will not use or disclose personal information for purposes other than those for which the information was collected, except with the consent of the individual or as permitted by law. The MFRC will retain personal information only as long as necessary for the fulfillment of those purposes. The MFRC will dispose of person info as soon as it is no longer serving the purpose for which it was collected and is longer necessary for legal of business purposes.

Principle 6 – Accuracy

The MFRC will maintain personal information in an accurate, complete, and timely manner, as it is necessary for the purposes for which it is to be used. The extent to which personal information must be accurate, complete and up-to-date will depend upon the use of information. The MFRC will routinely update personal information to fulfill the purpose for which it was collected i.e. mailing lists.

Principle 7 – Safeguards

The MFRC will protect personal information with security safeguards appropriate to the sensitivity of the information. The security safeguards protect personal information against loss, theft, as well as unauthorized access, disclosure, copying, use, or modification. Paper format personal information is kept in locked filing cabinets. Electronic format personal information is kept on computers with high security measures and passwords. Access to personal information is restricted to relevant and authorized staff.

Principle 8 – Openness

The MFRC will make readily available to individuals specific information about policies and procedures relating to the management of personal information. Information to be made available to you includes: - How to contact the Privacy Officer or Executive Director of the MFRC who can answer questions about its purposes for collecting personal information. - How an individual can gain access

to her/his or personal information and the name and contact info of the person to whom access requests should be sent. - A description, upon request, of the type of personal info held by the MFRC, including a general account of its use. - A copy of brochures or other info that explains MFRC policies and procedures. - The process for making a complaint about its personal information practices.

Principle 9 – Individual Access

Upon making a request to our Privacy Officer, a member/family, MFRC staff or third party shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information, except where permitted by law. An individual is able to challenge the accuracy and completeness of the information and have it amended as appropriate. The MFRC will respond to a request for individual access within thirty (30) business days after receipt of the request, unless extension of time is permitted under the Act (PIPA). If refused access, the MFRC will provide the reasons and the provision of the Act (PIPA) on which refusal was based, the name of who can answer the applicant's questions and info on how to request a review by the Information and Privacy Commissioner. Before the MFRC provides an account of the existence, use, and disclosure of personal information of a particular individual, the individual may be required to provide sufficient information for identity verification purposes in order for the MFRC to provide an account of existing personal information. Personal information collected for identity verification purposes will only be used for this purpose.

Principle 10 – Challenging Compliance and Providing Recourse

An individual may inquire about or challenge MFRC's compliance with these principles by contacting the MFRC Privacy Officer or the MFRC Executive Director.

The MFRC has procedures in place to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information. The complaint procedures are easily accessible and simple to use. [Click here](#) for information on how to do this.

The MFRC will investigate all complaints. If a complaint is found to be justified through the complaint review process, the MFRC will take appropriate measures, including reviewing its policies and practices, if necessary.

How can I contact the Esquimalt MFRC Privacy Officer or Executive Director?

If you have questions or concerns about our privacy policy, or the administration of the Privacy Code for Military Family Services Program and the Personal Information Protection Act (PIPA) please feel free to speak to the MFRC Privacy Officer or the MFRC Executive Director. Both individuals can also be reached by telephone at 250-363-2640.

How to access your personal information

Depending on the extent of your request, either the MFRC Privacy Officer or an individual MFRC Coordinator can arrange for you to have access to your personal information for viewing and an opportunity to evaluate its accuracy. To request an informal viewing of your personal information held in a specific program area simply ask the applicable MFRC Coordinator to view your personal information.

The MFRC Coordinator may deem it necessary for you to submit a formal request to the Esquimalt MFRC Privacy Officer. Please contact the MFRC Privacy Officer or MFRC Executive Director at 363-2640 to obtain the Esquimalt MFRC Personal Information Request Form.

What happens after I submit the Esquimalt MFRC Personal Information Request Form?

The MFRC Privacy Officer will send you an Acknowledgement of Request within five (5) business days of receipt of your request.

The MFRC Privacy Officer will then compile the requested personal information held by the organization during the following thirty (30) business days. During this time you may be contacted if necessary to clarify your request and to provide proof of identity. Your request for information will be shared with relevant staff to ensure that an accurate compilation is made.

The Privacy Officer will contact you within thirty (30) business days of the Date Received to inform you of your request results.

Where the personal information held is found to be justifiably inaccurate or incomplete organization will correct it accordingly.

If all or part of the requested information or correction is refused, the applicant will be provided with a response that includes: a) the reason and provision of the Act under which refusal is based; b) information on how to request a review by the Information and Privacy Commissioner.

How can I submit a privacy complaint regarding the Esquimalt MFRC?

You can submit a privacy complaint to the MFRC by contacting the MFRC Privacy Officer or MFRC Executive Director at 363-2640. You will receive the Esquimalt MFRC Privacy Complaint Form to complete in order for the MFRC Privacy Officer to investigate your complaint.

What happens after I submit a complaint?

1. The MFRC Privacy Officer will send you an Acknowledgement of Complaint within five (5) business days of receipt of your complaint.

2. The MFRC Privacy Officer will then investigate your complaint during the following 30 business days after sending the Acknowledgement of Complaint. During this time the Privacy Officer may contact you if it is necessary to clarify your complaint.

3. The results of the complaint investigation will be conveyed to the complainant within 30 business days of the Acknowledgement of Complaint unless other arrangements are made with the complainant.

4. Where the complaint is justified, appropriate measures to rectify the situation will be taken, including correcting information handling practices and policies where necessary and communicating those changes to relevant staff.