



**BRITISH  
COLUMBIA**

## **BCFA POLICY**

### **COMPLIANCE WITH PERSONAL INFORMATION AND PROTECTION ACT**

#### **Introduction**

The BC Fencing Association (BCFA) values and upholds the right to privacy and the protection of personal information. BCFA is committed to ensuring compliance with PIPA, British Columbia's "Personal Information Protection Act".

#### **1 What is personal information**

"Personal Information" means all information about an identifiable individual.

#### **2. Who we collect information from, type of information collected and uses and limits of the information collected.**

BCFA collects and maintains personal information that is required for its operations on five major groups of people:

- Volunteers,
- Members and program participants,
- Donors, and
- Board Members
- Employees (such as contracted provincial coach)

The specific type and use of the information collected in each of these groups includes:

#### *Volunteers*

Demographic and other personal information regarding BCFA volunteers is collected and kept as a point of reference for the association to be able to contact volunteers

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to represent and support BCFA at program activities, special events, fundraising and administrative duties. The contact information is kept in a secure manner and access is restricted to appropriate individuals who require volunteers to carry out BCFA activities.

#### *Members & Program Participants*

Demographic and other personal information is collected about members and program participants for the following purposes:

- to establish and maintain a responsible relationship with our members and to provide ongoing service to all areas of fencing in British Columbia;
- to support and assist our member clubs in delivering programs and services at the local level;
- to support and assist Canadian Sport Organizations responsible for delivering services to our member sports at the national and international levels;
- to understand needs and preferences;
- to manage and develop our operations;
- help us plan for future growth and,
- to meet regulatory and reporting requirements.

The information is kept in a secure manner and access is restricted to appropriate individuals within the organization who plan, develop and provide association program services or report membership data as required by the Government of British Columbia.

#### *Donors*

Demographic and donation information is collected and updated for our donors so that BCFA can issue tax receipts.

#### *Board Members*

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As part of the nomination process to the Board, each prospective board member submits contact and biographical information. BCFA provides this information to the membership once the members have been elected to the Board and maintains it over the duration of the tenure.

#### *Employees*

The BCFA collects demographic information about employees in order that they may be paid appropriately. The BCFA also collects performance related data, such as evaluation of services provided.

#### *High Performance Athletes*

The BCFA will collect biographical data from high performance athletes. This data is used to provide athlete biographies on the BCFA website and other promotional materials

BCFA will inform people what information is being collected, how it will be collected and for what purposes. BCFA will obtain consent for the collection, maintenance or sharing of material.

BCFA will limit the amount and type of information collected to that, which is reasonable and necessary to fulfil its stated purpose. BCFA uses personal information only for the purposes for which it is collected.

### **3. Consent**

BCFA will obtain consent to collect, use or disclose personal information (except where authorized or required by law to do so without consent). Consent can be written,

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verbal, or implied, given through an authorized representative such as parent or guardian, lawyer or agent.

Consent may be refused or withdrawn at any time, subject to legal or contractual restrictions and reasonable notice.

#### **4. Accuracy & Retention of Personal Information**

BCFA strives to ensure that personal information maintained, used or collected is accurate. There is a right to review information and request changes caused by inaccuracies where necessary

Once the appropriate time period has been surpassed, paper files are shredded and electronic files are deleted.

#### **5. Protection of Personal Information**

BCFA will protect the privacy of personal information that is collected through:

- a) Implementing administrative procedures;
- b) Ensuring physical safeguards
- c) Managing technical security services and mechanisms

#### **6. Complaints**

BCFA will investigate all complaints received and take appropriate measures to correct information and handling practices as required. Individuals may appeal any BCFA decision to the Information and Privacy Commissioner of British Columbia.

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## **7. Privacy Officer**

The Board of Directors will appoint the Privacy Officer. The Privacy Officer will be knowledgeable about BCFA's personal information management practices. The BCFA Privacy Officer is the person within BCFA whose job it is to:

- a) Encourage compliance with provisions of the personal Information Protection Act;
- b) Respond to requests for access to and correction of personal information and general issues concerning personal information;
- c) Work with the Information and Privacy Commissioner during an investigation of privacy complaint against BCFA; and,
- d) Manage BCFA's complaint process.

The Privacy Officer may be a volunteer or staff member. The name and contact details of the BCFA Privacy Officer will be published on the BCFA website or available by contacting [president.bcfa@gmail.com](mailto:president.bcfa@gmail.com)

## **8. Delegation of duties**

The Privacy Officer may delegate his or her duties to another individual. Such delegation must be written delegation, which is circulated, to the Board of Directors.

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## **9. Communication materials**

Consent is not required to disclose information (including photos and videos) obtained by observation at a public event in which an individual voluntarily participates. However, as a courtesy, BCFA will endeavour to obtain consent to use personal information in its publications such as layout, in communications materials such as posters and press releases and on its web site.

## **10. Accessing and Correcting Information**

An individual has the right to access their personal information and to correct errors of fact.

- Requests for access to personal information must be made in writing to the Privacy Officer. The request must include sufficient detail to enable the Privacy Officer to identify the information requests
- The Privacy Officer must respond to the request for access within 30 business days. The response must include, if requested, the ways, in which the personal information has or is being used, and a list of organizations to which the information has been disclosed.
- The Act identifies certain circumstances where information may be withheld. If the Privacy Officer withholds information, he or she must give the reason and identify the section in the Act under which the information is being withheld.
- If personal information held by BCFA is incorrect, an individual may request correction by writing to the Privacy Officer. The individual must provide sufficient documentation to show that the correction is justified. Any original documentation supplied through this process by an individual will be returned, although copies will be taken for the file.

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- The Privacy Officer will ensure that the appropriate corrections are made and that any incorrect information that has been disclosed within the year prior to the request is corrected.
- An individual may not correct opinions, but may annotate their file. This is done in writing to the Privacy Officer.
- An individual may not request original documents held by BCFA but may request copies. BCFA will provide copies to the individual at minimal or no cost. These documents must relate solely to the individual's personal information and may not include information of a personal nature about any other individual.

## **11. Handling Complaints about Personal Information**

### **Initiating a complaint**

Complaints about BCFA's management of personal information may be instigated verbally or in writing and should be directed to the BCFA Privacy Officer. Whether verbal or written, the complaint should document the thoroughly and with all relevant details. Initial complaints may be directed to members of staff, management, or to a representative of the Board of Directors who will pass them to the Privacy Officer.

### **Investigating a complaint**

Any person who may be named in the complaint may not investigate complaints.

- The Privacy Officer will investigate all complaints received. The Investigator will acknowledge receipt of the complaint promptly, and may contact the individual to clarify the complaint if necessary.
- The Investigator will be given access to all records, employees and others that handled the personal information or access request.

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- Where the complaint is justified, the Investigator will take appropriate measure to rectify the situation, including correcting information handling practices and policies where necessary and communicating those changes to relevant staff and volunteers. The Investigator will follow up to verify that the required changes have been implemented.
- The Investigator will notify individuals of the results of an investigation clearly and promptly, informing them of relevant steps taken.
- The Investigator will record all decisions to ensure consistency in applying the Act.

#### **Requesting a review**

Should an individual not be satisfied with the handling of their complaint, the Privacy Officer will inform them of the recourse they have to request a review by the Information and Privacy Commissioner of British Columbia. The Privacy Officer will provide the required contact information to a complainant wishing a review.

#### **12. Providing Employment or Personal References**

No member of the BCFA management and staff or representative of the BCFA Board of Directors may provide a personal or employment reference for an individual without the consent of the individual. In absence of consent, BCFA will only confirm an employment; i.e. “yes, that individual worked/volunteered for us” or “no, that individual did not work/volunteers for us.”

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Consent is given by an individual's request to BCFA for a written reference or for use of a BCFA representative's name. In absence of such request from the individual, BCFA or one of its representatives must have satisfactory confirmation of consent before providing an employment or personal reference. That confirmation may be a fax of a resume listing BCFA or its representative as a referee. It is not BCFA's responsibility to seek consent.

### **13. Collecting information without Consent**

According to the Act, BCFA may collect, use or disclose personal information without the consent of the individual. BCFA will forgo obtaining consent on the following occasions

- When collecting or disclosing the information clearly benefits an individual or is necessary for medical treatment and consent cannot be obtained in a timely way.
- When information is needed for a proceeding or an investigation and getting consent might compromise the availability or accuracy of the information
- When the information is used for journalistic purposes and for no other purpose
- When the information is collected by observation at a competition or other public event in which the individual voluntarily participates
- When the information is necessary to determine the individual's suitability to receive an honour or award or be selected for athletic purpose.
- When the collection of information is required or authorized by law (such as criminal record checks)
- When the information is necessary to facilitate collection of a debt owed to BCFA

### **Updating Privacy Policy and Procedures**

The Privacy Officer will be responsible for answering questions about the BCFA personal information policy and procedures. BCFA will update its Privacy Policy and Procedures on a regular basis and provide information on changes in a timely way through the BCFA web site.

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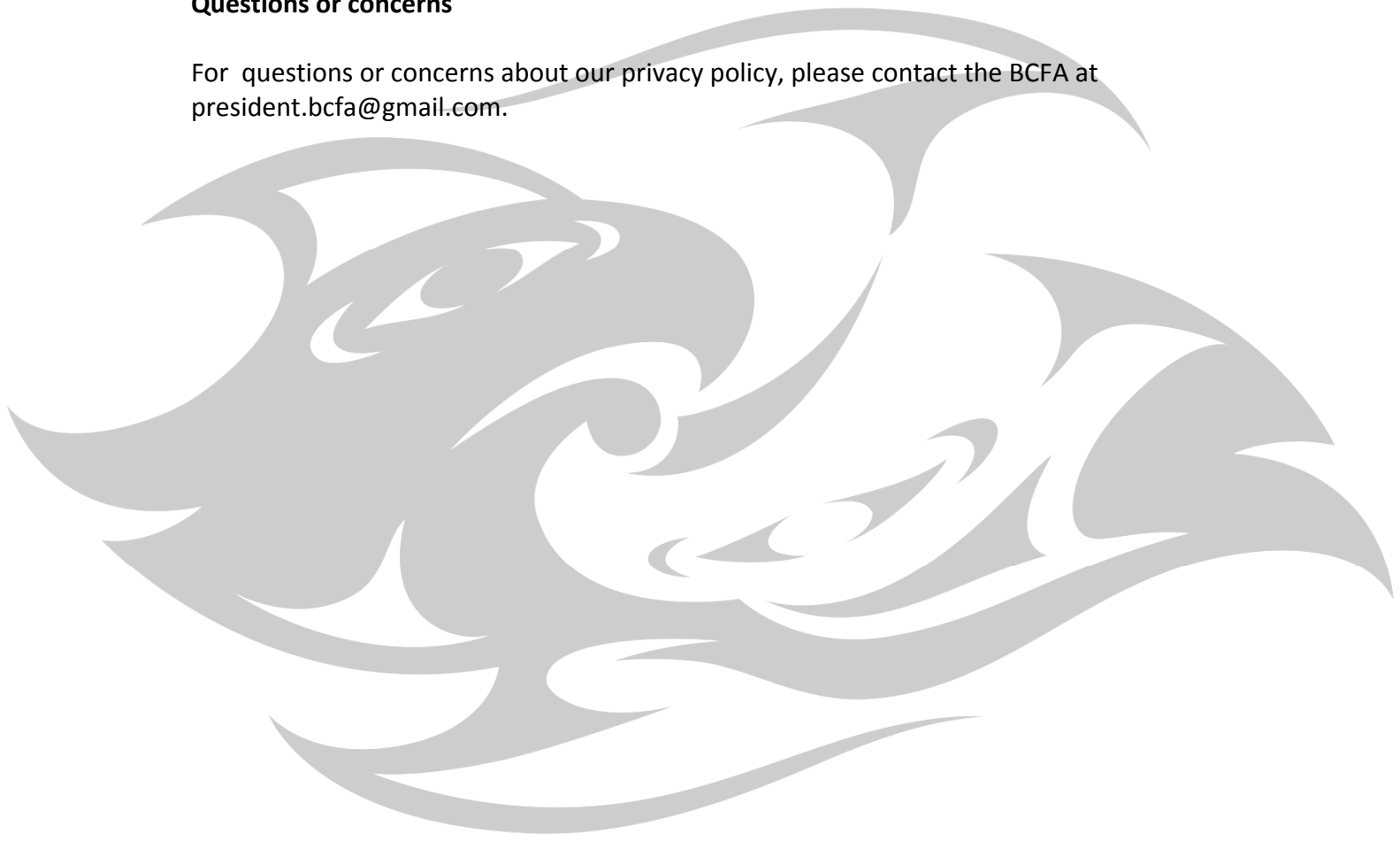
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**Questions or concerns**

For questions or concerns about our privacy policy, please contact the BCFA at [president.bcfa@gmail.com](mailto:president.bcfa@gmail.com).



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