

Privacy Policy

Background

At the time of drafting this policy, the provincial and federal legislation has minimal consequence to the Edmonton Gleaners Association, as they are primarily concerned about information collected for “commercial activity”.

What is a commercial activity?

- A transaction or regular course of activity that is of a commercial character
 - e.g. offering services or goods where there is a two-way benefit
 - Activities undertaken by non-profits that are also offered by the private sector
- Included: memberships, lotteries, fee-for-service
- Excluded: donations; employees of non-profit organizations

However, it is important for the Edmonton Gleaners Association to have a privacy policy in place to ensure personal information is handled with respect and consideration of clients', donors', employees', and volunteers' individual privacy needs.

This policy was drafted using the provincial Personal Information Protection Act as a guideline.

Policy

The Edmonton Gleaners Association (Edmonton's Food Bank or Food Bank) is responsible for all personal information in its custody and under its control. This includes employee, client, volunteer, and donor information.

1. The Executive Director is the individual designated to ensure the Food Bank remains in compliance with this policy.
2. Personal information will be obtained only for reasonable purposes and only as much as is reasonable for those purposes.
3. Personal information will be disclosed or used for reasonable purposes, and those purposes will be shared with the individual prior to disclosure or use.
4. Consent will be implied unless the individual expressly prohibits the use of information for the disclosure and use shared by the Food Bank.
5. Occasionally, individuals or organizations may request to see what information about themselves the Food Bank has gathered. In that event, the Food Bank will provide information about the existence, use or disclosure of the information and provide access to that information, if reasonable.
6. The Food Bank will make every reasonable effort to maintain accurate information and will, on request, correct information that is inaccurate.
7. The Food Bank will ensure personal information is reasonable secure and keep the information only as long as is reasonable.

Procedures

1. The Executive Director is the individual designated to ensure the Food Bank remains in compliance with this policy.
 - a. The Executive Director will become familiar with this policy and both Federal and Provincial privacy legislation.
 - b. The Executive Director will ensure staff are adequately trained around this policy, the principles of privacy protection and how the policy affects their jobs.
 - c. Requests for information about the Food Bank's management of personal information will be directed to the Executive Director.

2. Personal information will be obtained only for reasonable purposes and only as much as is reasonable for those purposes.
 - a. Client information is collected for such purposes as:
 - i. Food Bank statistical information
 - ii. Providing advocacy, referral, and food services to the individual(s)
 - iii. Tracking of Client Services between food service or family providers (agencies)
 - b. Information around agencies, churches, and food depots accessing food from the Food Bank is collected for such purposes as:
 - i. Administration of applications and disbursements of food
 - ii. Communications such as newsletters, annual reports, and invitations to events such as AGM
 - c. Personal information around donors and prospective donors is collected for such purposes as:
 - i. Receipting
 - ii. Communications such as newsletters, annual reports, and invitations to event as AGM
 - iii. Special communications when deemed necessary
 - iv. Analysis of donor trends
 - d. Personal information around staff is collected for such purposes as:
 - i. Payroll and benefits
 - ii. Hiring and performance reviews
 - iii. Communications as deemed necessary
 - iv. Regulatory requirements that affect the Food Bank
 - e. Personal information about volunteers is collected for such purposes as:
 - i. Communications such as newsletters, annual reports, and invitations to event as AGM
 - ii. Special communication when deemed necessary
 - iii. For Board and Committee members, distribution of agendas and minutes as appropriate
 - iv. Regulatory requirements that affect the Food Bank

A reasonable amount of information would be the amount necessary to fulfill the purposes as outlined above. In addition, information provided by donors, prospective donors, and volunteers may be collected to ensure their communications needs are met (for example, information may be collected to capture a donor's interest in a specific project to ensure further education and awareness around the project is shared appropriately.)

3. Personal information will be disclosed or used only for reasonable purposes, and those purposes will be shared with the individual prior to disclosure or use.
 - a. The Food Bank will share with individuals why they are collecting personal information and individuals, at any time, will be given the opportunity to opt out of receiving that information.
 - b. Individuals will have an option to request their name be removed from mailing lists in each general publication (newsletters, annual reports).
4. Unless an individual expressly prohibits the use of personal information, the Food Bank shall use that information for reasonable purposes in the operation of its business (i.e. Distribution of newsletters, invitations, and annual reports; donor recognition).
 - a. The Food Bank will make reasonable efforts that request from individuals who wish to be removed from mailing lists are dealt with within three business days.
5. Occasionally, individuals or organizations may request to see what information about themselves the Food Bank has gathered. In that event, the Food Bank will provide information about the existence, use or disclosure of the information and provide access to that information, if reasonable.
 - a. Requests for information pertaining to staff, volunteers, or donors will be directed through the Executive Director; Clients and agencies may request information through the Client Services Coordinator.
 - b. Requests must be in writing from the individual or authorized representative.
 - c. Requests will be reviewed to ensure that any information released will not threaten the safety or security of another individual.
 - d. The Food Bank will respond with 45 days openly, completely, and accurately.
 - e. The Food Bank will make every reasonable effort to help applicants understand what the information is about and how it is used.
 - f. If the Food Bank refuses access to any or all of an individual's personal information, it will explain to the applicant the reasons for refusing and the name of the person who can answer any questions the applicant may have.
6. The Food Bank will make every reasonable effort to maintain accurate information and will, on request, correct information that is inaccurate.
 - a. As information is received regarding inaccurate information, the database will be updated accordingly prior to the next use of the information.

7. The Food Bank will ensure personal information is secure and keep the information only as long as is reasonable.
 - a. The Food Bank will not, under any circumstances, share, lend, trade, or sell mailing lists in whole or in part.
 - b. All computer work stations in the Food Bank are password protected.
 - c. Any file (paper or electronic) containing personal information will be destroyed prior to disposal.
 - d. Personal information will be destroyed according to Federal and Provincial requirements unless required for reasonable purposes for the ongoing operations of the Food Bank.
 - e. Employees of the Food Bank will not take or send personal information from the Food Bank place of business unless it is required in the course of their employment (i.e. working off site). Should that occur, it will be the responsibility of the employee to ensure that:
 - i. The information is kept secure
 - ii. The information is returned to the Food Bank within a reasonable time frame
 - iii. No files (paper or electronic) are retained offsite by employees longer than necessary to complete the task
 - f. The Food Bank will ensure that all software program and files from the computers being retired from service are deleted before that computer leaves the Food Bank premises.