



Policy Type:	Governance	Creation Date:	May 28, 2024
Policy #:	102	Approval Date:	June 5, 2024
Policy Title:	102 - Network Privacy Policy	Approved by:	Vernice Atkin Board Chair Angela Kemble Executive Director

NWCFASD Network Privacy Policy

1.0 Overview

Northwest Central Fetal Alcohol Spectrum Disorder (NWCFASD) Network respects and is committed to protecting staff, volunteers (board and non-board), and clients privacy and personal information. This Privacy Policy outlines how the Network collects, uses, and safeguards the personal information of our staff, volunteers, and clients.

2.0 Procedures

Personal Information Collected

- a. **Staff:** The Network may collect personal information from staff, including but not limited to names, contact information, date of birth, gender, employment history, and relevant qualifications.
- b. **Volunteers:** Personal information collected from volunteers (board and non-board) may include names, contact information, relevant volunteer history, skills/expertise, date of birth, gender, etc.
- c. **Clients:** For clients, the Network may collect personal information such as names, contact information, demographic details, gender, FASD assessment details and other relevant case or service-related information.

Use of Personal Information

- a. **Staff:** Personal information collected from staff is used for purposes related to employment, including payroll processing, communication, performance evaluation, and providing employee benefits.
- b. **Volunteers:** Personal information of volunteers (board and non-board) is used to manage volunteer activities, maintain records, communicate with volunteers, and acknowledge their contributions.



c. **Clients:** The personal information of clients is used to provide services, maintain records, communicate with clients, and improve program and service delivery.

Storage, Access, Transfer/ Disclosure of Personal Information

a. Safeguarding & Storage:

- The Network protects personal information and makes every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to information.
- The NWCFASD Network employs industry-standard security measures to safeguard personal information collected, stored, and processed by our organization. This includes encryption, access controls, and regular security audits. Alternate or additional security measures may be used when destroying personal information, including shredding paper records and permanently deleting electronic records.
- NWCFASD Network makes every reasonable effort to ensure that personal information is accurate and complete. Individuals are advised to notify the Network if there are changes to information.

b. Access:

- Access to personal information is confidential and restricted to authorized personnel who require access for legitimate purposes only..
- Individuals have a right to access their own personal information in a record that is in the custody or under the control of NWCFASD Network, subject to some exceptions. For example, organizations are required under the Personal Information Protection Act (PIPA) to refuse to provide access to information that would reveal personal information about another individual.
- If the NWCFASD Network refuses a request in whole or in part, the Network will provide the reasons for the refusal. In some cases where exceptions to access apply, the Network may withhold that information and provide you with the remainder of the record.
- Requests for access, use, disclosure, error or correction of personal information can be made in writing to the Executive Director of the Network, Angela Kemble. The Network will respond to requests within 45 calendar days, unless an extension is granted.

c. Transfer/ Disclosure:

- The Network may disclose personal information only with the individual's consent except in the limited circumstances where use without consent is allowed.
- The Personal Information Protection Act (PIPA) allows an organization to



disclose someone's personal information without that person's consent under specific circumstances and exemptions (Government of Alberta)..

- Transferring of personal information to third-party service providers or partners is unauthorized. Unless consent is obtained and such transfers comply with all applicable data protection laws and legislation.

Consent

- By providing your personal information to NWCFASD Network, you consent to the collection, use, and disclosure of personal information in accordance with this Privacy Policy and in accordance with ***The Personal Information Protection Act (PIPA)***.
- The Network recognizes that individuals have the right to withdraw or change their consent, at any time but subject to legal limitations. If a staff, volunteer or client changes the consent status, the Network must abide by the new terms. If the consent is fully withdrawn the Network will stop collecting, using, or disclosing personal information immediately.

3. Additional Contact Information

For any further questions, concerns, and/or complaints about any collection, use, or disclosure of personal information by NWCFASD Network or about a request for access to personal information, changes, omissions, et cetera, please contact the Network's Executive Director, Angela Kemble.

If you are unsatisfied with the Network regarding collection, use, or disclosure of information, please contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 - 6 Avenue, SW
Calgary, Alberta T2P 3W2
Phone: 403-297-2728
Toll Free: 1-888-878-4044
Email: generalinfo@oipc.ab.ca
Website: www.oipc.ab.ca

4. References

[Overview of the Personal Information Protection Act](#)

[Personal Information Protection Act \(PIPA\)](#)

[Disclosure without Consent](#)

[Sample Privacy Policy - A non-profit organization subject to PIPA](#)



5.0 Revision & Approval History

Date of Change	Lead	Summary of Change
May 28, 2024	Executive Director	<i>Creation of policy) and review of draft policy with the Governance Board and submission of final changes and edits to administration.</i>
June 5, 2023	Executive Director	<i>Final review and e-vote approval from board received. Policy is now approved.</i>