



# Diocese of Huron

The Anglican Church of Canada

## Confidentiality and Privacy Standards Policy

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*The Diocese of Huron is committed to providing ministry to all persons. In order to provide a secure and confidential environment in which we can proclaim the Gospel of Christ with integrity and respect, it is necessary to take measures that will provide a level of confidentiality and privacy to all those who seek our ministry and for those who do ministry.*

*To this end, one of the policies in place is the Diocese of Huron Privacy Standards Policy which takes into consideration that in order to do ministry and in order to comply with various Government regulation relating to maintaining records on employees, etc., the policy allows for the collection, management, retention and disposition of personal information held at Huron Church House (190 Queens Ave., London) and at the Verschoyle Philip Cronyn Memorial Archvie (1349 Western Road, London). The complete Policy is reproduced here. Any questions on the policy should be directed to the Interim Privacy Officer.*

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## Privacy Standards Policy

### **Purpose:**

The Diocese of Huron has a Privacy Standards Policy, applicable to all individuals, lay or ordained, paid or unpaid, who serve in the Diocese of Huron under the jurisdiction of the Bishop of Huron, to ensure the proper collection, retention and distribution of personal information.

### **Collection:**

Huron Church House has a centralized record management process for the collection, management, retention and disposition of personal information. Information about clergy, employees and many volunteers is located electronically on a central database at Huron Church House. Each cleric and employee of the Diocese, whether full-time, part-time or contract, has a confidential and secure personnel file located in the Human Resources Department as well as in payroll files in the payroll office. A payroll service is utilized to administer payroll for parish and Diocesan staff. Congregational information is secured in parish files in several departments and is stored electronically on the central database at Huron Church House. The Development Office and Accounting Department manages all donor record information. All personal information is the property of the Incorporated Synod of the Diocese of Huron and all individuals have controlled access to their

personal information. All personal information obtained by other organizations and agencies must comply with standards comparable to the Diocesan Privacy Standards Policy (i.e. payroll administration, benefits providers).

**Definition:**

Personal information includes any factual or subjective information, recorded or not, about an individual. Personal information does not include the name, title or business address or telephone number of an employee of an organization. Personal information includes information in any form, such as: home address and home phone number, age, marital status, family members' names, employee files, identification numbers, ethnic origin, evaluations, disciplinary actions, the existence of a dispute, opinions, comments, social status, income, credit records, donation information, loan records or medical records.

**Principles:**

Huron Church House staff will follow the ten principles for handling personal information as set out in Schedule 1 of the *Personal Information Protection and Electronics Document Act of Canada*. These principles are: accountability, identifying purposes, consent, limiting collection, limiting use, disclosure and retention, accuracy, safeguards, openness, individual access, and provision of recourse.

**Accountability:**

The Diocesan Bishop will designate a person to be the Privacy Officer in the Diocese with responsibility to ensure compliance with the Diocesan Privacy Standards Policy. Staff must be informed of the name and responsibilities of the Privacy Officer. The Privacy Officer will report to the Diocesan Bishop for discussion on a regular basis in regard to any activities related to personal information protection. The Privacy Officer will ensure regular training for staff/volunteers as to the policies and procedures personal information protection requires. The Policy will be reviewed periodically by the Privacy Officer and placed in the Diocesan Staff Manual. Employees will be made aware of the importance of maintaining the security and confidentiality of personal information. The misuse or improper handling of personal information may result in disciplinary action up to and including dismissal.

All staff at Huron Church House are required to sign a confidentiality and privacy statement and failure to comply with the Diocesan Confidentiality Policy will be grounds for dismissal.

Each department will assign one person responsible for ensuring the standards are maintained. Each department must follow the procedures for collection, retention and distribution listed below and assign personal information to one of the three levels:

**Level 1 – Highly Restricted**

**Level 2—Confidential**

### **Level 3—General Information**

#### **Exceptions to the Consent principles:**

Huron Church House may collect and use personal information without consent:

- (a) If it is clearly in the individual's interests and consent is not available in a timely way
- (b) If collection is required to investigate a breach of an agreement or contravention of a federal or provincial law
- (c) For journalistic, artistic or literary purposes
- (d) If it is publicly available
- (e) For an emergency that threatens an individual's life, health or security
- (f) For statistical or scholarly study or research.

Huron Church House may disclose personal information without consent:

- (a) To a lawyer representing the Diocese
- (b) To collect a debt the individual owes the Diocese
- (c) To comply with a subpoena, warrant or order made by a court or other juridical body
- (d) To a lawfully authorized government authority

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**Please visit the following link to learn more about our  
Diocesan Privacy Policy:**

<http://www.diohuron.org/what/HR/policies/section24/Diocese%20of%20Huron%20Privacy%20Policy1.pdf>