

Privacy Notice

The BC Association of Clinical Counsellors (BCACC) collects *personal information* (PI) from individuals through: phone conversations; website forms; fillable Microsoft Word and PDF forms; digital documents/templates; paper documents/forms; and, emails and their attachments.

Categories of individuals and the purpose for collection are as follows:

- Member applicants, who want to become BCACC members;
- Members, who want to: maintain membership; promote their services through the BCACC's online member directory; and, take advantage of member programs and benefits;
- Job applicants, who want to become employees;
- References and supervisors, who need to verify work history or performance;
- Employees, who need to: provide information to facilitate employment; and want to take advantage of employee programs and benefits; and,
- Complainants, who have concerns regarding a registered member.

PI collected may include: Name; address; home phone number; mobile number; email address; education; certifications; work history; references; interview information; emergency contacts; photograph; signature; criminal record check; banking information; beneficiaries; and, disclosures related to claims, misconduct, negligence, offences and investigations.

Consent

Before we collect your PI, we ensure you understand the purpose of the collection and that you are providing implicit or explicit consent to give it to us.

Disclosure

Access to BCACC records is limited to authorized staff and to trusted third-parties under a need-to-know basis. Staff are authorized based on their roles and responsibilities, and trusted third parties are retained to provide technology security and storage support services to us.

We do not rent or sell any PI we collect from you with any third parties. Unless we are required to share PI under a court order, subpoena or specific allowances under British Columbia's *Personal Information Protection Act* (PIPA) that allow for disclosure without consent, you provide oral or written consent for your PI to be shared with third parties.

Retention

Your information is retained for only as long as it is necessary for legal and business purposes. Personal information used to make a decision about an individual is retained for one year after using it. This provides that individual with reasonable opportunity to obtain access to it.

At BCACC, PI is protected through physical¹, administrative² and technical³ safeguards. When PI is stored externally, we ensure that our trusted third-party service providers meet or exceed our safeguard standards.

Destruction

Digital files are deleted and trashed from software and systems. However, for security and business continuity purposes, PI may be retained for an additional 90 days in back-up systems.

For paper destruction we use a third-party service provider, who guarantees security that meets legislative standards for shredding and disposal.

Retired computer hard drives are permanently erased using data destruction software and then destroyed using a third-party service provider, who guarantees and confirms destruction.

Protection of personal information from unauthorized access or a privacy breach

We embed protection of PI into our operations and culture to comply with PIPA. BCACC manages and protects PI through a Privacy Management Program⁴ (PMP) that was developed and implemented with the support of a certified information privacy professional. Our PMP has program controls that include reporting structures, a personal information inventory, policies, risk assessment, training, breach response and service provider management. The program also includes an ongoing maintenance and improvement plan.

All PI provided to us is processed and stored in Canada, with the following exceptions:

- Contact information that is initially collected through our website, resides on a server in the United States, until it is deleted from the server; and,
- Payroll information resides on a server in the United States.

¹ Physical safeguards include: locked records and offices; and, building security and alarms.

² Administrative safeguards include: Privacy and related policies; staff training; and confidentiality agreements.

³ Technical safeguards include: unique log-ins and passwords; firewalls; and encryption of data stored or carried on mobile devices (USB, laptops).

⁴ BCACC's PMP follows the guidelines published by the Office of the Privacy Commissioner of Canada and the Office of the Information and Privacy Commissioner for British Columbia in *Getting Accountability Right with a Privacy Management Program*: <https://www.ojpc.bc.ca/guidance-documents/1435>.

Your rights to the personal information that we collect from you

- You have the *right to withdraw consent*. You may withdraw your consent for PI collection at any time, in writing, with reasonable notice to BCACC. However, consent cannot be withdrawn retroactively.
- You have the *right to access the PI that we hold about you*. To access your information, submit a written request to our Privacy Officer.
- You have the *right to ensure the PI that we hold about you is accurate and complete*. To update your information, submit a written request to our Privacy Officer or a staff member.

To protect your PI, we require proof of identity to fulfill any of the above requests.

How to contact the BCACC about privacy

If you have questions or concerns regarding privacy, or would like to make a complaint about collection, use or disclosure of PI you can:

- contact the BCACC's Privacy Officer at (250) 595-4448 or 1-800-909-6303;
- send an email to privacyofficer@bc-counsellors.org; or,
- write to: BCACC Privacy Officer, #204 – 780 Tolmie Avenue, Victoria, BC V8X 3W4

Not satisfied with our response?

If we haven't responded to your privacy questions, concerns or complaints within 30 days, or you are unsatisfied with our response within 30 days of receiving it, you may contact the Office of the Information & Privacy Commissioner for British Columbia to ask for a review or make a complaint.

Office of the Information & Privacy Commissioner for British Columbia
PO Box 9038 Stn. Prov. Govt.
Victoria BC V8W 9A4