

# PACIFIC COAST AMATEUR HOCKEY ASSOCIATION POLICIES AND PROCEDURES

## PERSONAL INFORMATION PROTECTION POLICY

TYPE: REF. ARTICLE.  
Issued: Oct. 13, 2004.  
Revised: June 18, 2013

### 1. **Introduction:**

PCAHA is committed to promoting Minor Hockey in partnership with its member Hockey Associations and Leagues, stressing sportsmanship, fair competition, development, and safety for hockey players of all skill levels, and to the supervision, direction, and co-ordination of member Hockey Associations and Leagues. Since providing these services involves the collection, use, and disclosure of some personal information about our participants, protecting participants' personal information is a high priority.

While PCAHA has always respected the privacy of our participants and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA), which came into effect on January 1, 2004, and sets out the ground rules for how BC businesses and not-for-profit organizations may collect, use, and disclose personal information.

We will inform participants of why and how we collect, use, and disclose their personal information, obtain their consent where required, and handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices that will be followed in protecting the personal information of participants. PCAHA's privacy commitment includes ensuring the accuracy, confidentiality, and security of our participants' personal information and allowing participants to request access their personal information for purposes of ensuring accuracy.

### 2. **Scope of Policy:**

This Policy applies to the PCAHA central office, Executive Committee members, and appointees. This Policy also applies to any service providers collecting, using, or disclosing personal information on behalf of the PCAHA.

### 3. **Definitions:**

"Participant" - means individuals, teams, Associations, and Leagues which participate in amateur hockey conducted under the auspices of PCAHA.

"Personal information" - means information about an identifiable individual, including age, names of parents and/or guardians, home address and phone number(s), medical information, and information regarding custody and/or guardianship. Personal information does not include contact information (described below).

"Contact information" - means information that would enable an individual to be contacted at a place of business and includes name, position, name or title, business telephone number, business address, and business email or business fax number. Contact information is not covered by this policy or PIPA.

"Privacy Officer" - means the individual designated with responsibility for ensuring that PCAHA and participants comply with this Policy and PIPA.

### 4. **Collecting Personal Information:**

- (a) Unless the purposes for collecting personal information are obvious and the participant voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

- (b) We will only collect participant information that is necessary to fulfill the following purposes:
- To determine eligibility for membership or participation;
  - To register or enrol the participant in a hockey program;
  - To verify age, identity, and place of residence for regulatory requirements;
  - To provide insurance coverage;
  - To send out PCAHA information;
  - To contact participants for functions and fundraising;
  - To facilitate the collection of dues;
  - To notify participants regarding complaints, hearings, decisions, and disciplinary actions;
  - To notify participants of meetings, seminars, and other PCAHA events.

5. **Consent:**

- (a) We will obtain participant consent to collect, use, or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- (b) Consent can be provided in writing at time of registration. or it can be implied where the purpose for collecting, using, or disclosing the personal information would be considered obvious and the participant voluntarily provides personal information for that purpose.
- (c) Consent may also be implied where a participant is given notice and a reasonable opportunity to opt out of his or her personal information being used for mail-outs or fund raising and the participant does not opt out.
- (d) Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), participants can withhold or withdraw their consent for the PCAHA and/or the Minor Hockey Association to use their personal information in certain ways. A participant's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product.
- Specifically, if a participant withholds personal information necessary to fulfill the purposes referred to in 4(b), above, the consequence may be denial of registration or inability to participate in a particular program or event. If so, we will explain the situation to assist the participant in making the decision.
- (e) We may collect, use, or disclose personal information without the participant's knowledge or consent in the following limited circumstances:
- When the collection, use, or disclosure of personal information is permitted or required by law;
  - In an emergency that threatens an individual's life, health, or personal security;
  - When the personal information is available from a public source (e.g., a telephone directory);
  - When we require legal advice from a lawyer;
  - To protect ourselves from fraud;
  - To investigate a complaint or an alleged or anticipated breach of the By-laws, Rules or Regulations.

6. **Using and Disclosing Personal Information:**

- (a) We will only use or disclose participant personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as conducting participant surveys in order to enhance the provision of our services;
- (b) We will not use or disclose participant personal information for any additional purpose unless we obtain consent to do so.
- (c) We will not sell participant lists or personal information to other parties.

7. **Retaining Personal Information:**

- (a) If we use participant personal information to make a decision that directly affects the participant, we will retain that personal information for at least one year so that the

participant has a reasonable opportunity to request access to it.

- (b) Subject to 7(a), we will retain participant personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

8. **Ensuring Accuracy of Personal Information:**

- (a) We will make reasonable efforts to ensure that a participant's personal information is accurate and complete where it may be used to make a decision about the participant or is disclosed to another organization.
- (b) Participants may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought. A request to correct personal information should be forwarded to the PCAHA Privacy Officer.
- (c) If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the participant's correction request in the file.

9. **Securing Personal Information:**

- (a) We are committed to ensuring the security of participant personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification, or disposal or similar risks.
- (b) The security measures employed shall be directly related to the level of sensitivity of the personal information. The more sensitive the information, the higher the level of security which will be employed. Methods of protection and safeguards to be employed shall include, but in no way be necessarily limited to, the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, and firewalls; restricting access to personal information to those Association personnel who need to know; and contractually requiring any service providers to provide comparable security measures.
- (c) We will use appropriate security measures when destroying participants' personal information, including shredding documents and deleting electronically stored information.
- (d) We will periodically review and update our security policies and controls as technology changes to ensure ongoing personal information security.

10. **Providing Participants' Access to Personal Information:**

- (a) Participants have a right to access their personal information, subject to limited exceptions. A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. All request to access personal information shall be forwarded to the PCAHA Privacy Officer.
- (b) Upon request, we will also tell participants how we use their personal information and to whom it has been disclosed if applicable.
- (c) We will make the requested information available within 30 business days or provide written notice of an extension where additional time is required to fulfill the request.
- (d) A appropriate minimal fee may be charged for providing access to personal information. Where a fee applies, we will inform the participant of the cost and request further direction from the participant on whether or not we should proceed with the request.
- (e) If a request is refused in full or in part, we will notify the participant in writing, providing the reasons for refusal and the recourse available to the participant.

11. **Questions and Complaints:**

- (a) The PCAHA Privacy Officer is responsible for ensuring PCAHA's compliance with this policy and the Persona/Information Protection Act.

PCAHA Personal Information Protection Policy (cont.):

- (b) Members and participants should direct any complaints, concerns, or questions regarding compliance with this Policy and PIPA in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member may also write to the Information and Privacy Commissioner of British Columbia.
- (c) Contact information for the PCAHA Privacy Officer is as follows:
  - Carol McGregor
  - #114-3993 Henning Drive
  - Burnaby, B.C.
  - V5C 6P7
  - Phone: 604-205-9011
  - Fax: 604-205-9016
  - E-mail: [privacy@pcaha.ca](mailto:privacy@pcaha.ca)

**SAMPLE CONSENT FORM #1**

*Section 6.7 Personal Information Protection Act (SBC 2003)*

I have read the Pacific Coast Amateur Hockey Association Personal Information Protection Policy.

I, (print) ....., hereby consent to the collection, use and disclosure of personal information as provided in the Pacific Coast Amateur Hockey Association Personal Information Policy.

Signature of participant .....

**SAMPLE CONSENT FORM #2**

*Section 6.7 Personal Information Protection Act (SBC 2003)*

I have read the Pacific Coast Amateur Hockey Association Personal Information Policy.

I, (print) ..... on my own behalf and behalf of my child,  
(print) ....., hereby consent to the collection, use and disclosure of personal information as provided in the Pacific Coast Amateur Hockey Association Personal Information Policy.

I, (print) ....., hereby consent to the collection, use and disclosure of personal information as provided in the Pacific Coast Amateur Hockey Association Personal Information Policy.

Signature of parent participant. ....

Signature of player participant .....