Protection of Personal Information

Policy No. 907

Policy Statement:

The Archdiocese and its parishes are subject to Alberta's Personal Information Protection Act (PIPA). Accordingly, personal information about parishioners is to be disclosed only with their consent or, in the case of minors, the consent of a parent or guardian.

Intent of Policy:

The Church encourages communications about its good works. Celebrations, rallies and social events all present opportunities for such communications through websites, parish bulletins and the news media. The intent of this policy is to ensure that personal information of parishioners is protected while at the same time ensuring that the mission of the Church is not hampered by lack of communication.

Definition:

Personal information includes but is not limited to names, telephone numbers, email addresses and other contact information, photographs, video recordings and audio recordings.

Consent can be given in a variety of ways:

- in writing
- orally
- implied:
 - if the individual volunteers their personal information
 - if advance notice is given in a form that could be reasonably understood.

Procedure:

- a) Names and contact information of volunteers for various lay ministries are vital to the work of those ministries. The disclosure of this information is limited to those parish or archdiocesan staff involved with the work of those ministries.
- b) Consent is to be obtained before collecting and posting a person's photograph or other personal information on a website or publishing in a parish bulletin or other publication.
- c) For all Archdiocese, parishes, camps or institutions events, celebrations or rallies, no personal information can be collected and disclosed without displaying in writing the following disclaimer at the event venue:
 "Personal information, including but not limited to photographs
 - "Personal information, including but not limited to photographs, videotapes, digital images, and audio recordings may be collected at this celebration or event and later used and disclosed at the discretion of the Catholic Archdiocese of Edmonton, its parishes, camps and institutions."
- d) For events involving children under the age of 18, the same notice must be given as in c). In addition, one or more consent forms must be signed by a parent/guardian. The PIPA Registration and Participation Form Appendix 907B should be



Communications

- part of any registration for sacraments, youth groups, etc., at the beginning of the year.
- e) For events where a child is specifically interviewed or identified by name, when the intent is to post this information on a website or include in another publication or broadcast on radio or TV, consent provided by the Participant Consent Form and Release Appendix 907C will also be required.
- f) Special consideration must be given before posting online photos of children, particularly if they are identified by name. Recommended practice is never to use surnames – e.g. write Stephen C., rather than Stephen Cook – unless specific consent of the parent/guardian has been obtained.
- g) Questions regarding privacy concerns are to be directed to the Privacy Officer of the Archdiocese who is the Director of Communications and Public Relations.

Exception:

This policy applies <u>only</u> to events where the Archdiocese, parish, camp or institution itself collects and intends to disclose the photos or other personal information; e.g., if a wedding is held in the parish hall and participants post their own photos on their own websites or social networks, it is not a privacy issue for the parish.

This policy does not cover personal information and photographs which were posted or published in various parish materials prior to the effective date of the policy. Parishes are encouraged to replace such materials with those where consent has been obtained in accordance with this policy.

Refer to Appendix:

907B PIPA Registration and Participation Form 907C Participant Consent Form and Release

