

# Society Manual

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## II. Privacy, Diversity, and Accessibility

### B. Privacy and Protection of Information

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<b>Practice Applies to:</b>	Everyone	<b>Review Date:</b>	
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<b>Final Accountability:</b>	Central Administration	<b>CARF Standard:</b>	

#### Overview

The Bloom Group handles information in accordance with the Freedom of Information and Protection of Privacy Act (Canada), and the Personal Information Protection Act (British Columbia). Information about the substance of these acts is made available at The Bloom Group branch offices. Questions and/or complaints regarding privacy and confidentiality may be directed to The Bloom Group's Privacy Officer; in addition, The Bloom Group staff will advise persons served of their rights with regard to privacy and confidentiality.

#### Our Practice

All persons served in services operated by The Bloom Group can expect that all personal information provided to The Bloom Group will be treated with the utmost confidentiality. The Bloom Group will release personal information concerning a person served to parties external to The Bloom Group only with the written permission of that person served (unless ordered by a court or tribunal of competent jurisdiction).

This policy is varied with respect to programs operated under contracts where services to persons served are mandated under the provisions of specific Acts or legislation (e.g. the Child, Family, and Community Services Act of British Columbia). In these situations, The Bloom Group staff will strive to adhere to this Privacy Policy; when information is to be shared with personnel of the mandating organization, The Bloom Group staff will strive to engage the client(s) involved in a cooperative manner.

The Bloom Group regularly reviews its privacy practices, and updates this policy as needed.

#### Contact Information:

For questions, concerns or complaints relating to The Bloom Group's privacy policy on the treatment of personal information, contact:

Privacy Officer: Munir Velji  
 Address: 391 Powell Street, Vancouver, BC V6A 1G5  
 Phone: 604-606-0334  
 Fax: 604-606-0309  
 Email: [mvelji@thebloomgroup.org](mailto:mvelji@thebloomgroup.org)

Further information on privacy and individual rights with regard to personal information may be found on the website of the Privacy Commissioner of Canada at <http://www.privcom.gc.ca/> and/or the Information and Privacy Commissioner for BC at <http://www.oipc.bc.ca/>.

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## a) Limits to Confidentiality

1. **Children in Need of Protection** - The Bloom Group is required under the *Child, Family, and Community Services Act of British Columbia* to report instances where it has reasonable cause to believe a child is in need of protection to the appropriate authorities. Whenever possible, parents are to be advised of the substance of the complaint, unless doing so would clearly create danger to a child or children.
2. **Duty to Warn - Potentially Suicidal/Homicidal/Dangerous Persons served** – The Bloom Group has a duty to protect the client from him/herself or to protect others if the client is perceived as a threat. In the case of a suicide threat, a medical referral or hospitalization may be instituted. If the client is considered to be dangerous to others, the police and/or a threatened person(s) may be informed. The Executive Director or designate must be informed in such an incidence by way of Critical Incident reporting.
3. **Legal Proceedings** – Staff members shall give evidence in court on a client-related matter only in response to a duly served subpoena, and upon express order of a court or tribunal of competent jurisdiction.

**Personal information:** This is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual. The Bloom Group collects, uses, and discloses personal information only for purposes that a reasonable person would consider appropriate in light of the circumstances. Individuals may opt not to have their information shared for purposes beyond those for which it was explicitly collected.

**Exceptions:** Business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information. Where an individual uses his or her home contact information as business contact information as well, The Bloom Group considers that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

**Use of Information:** The Bloom Group does not rent, sell or trade our mailing lists. The information provided by private individuals will be used to keep them informed and up to date on The Bloom Group's activities, including programs, services, special events, funding needs, opportunities to volunteer or to give, open houses, and other events. If at any time individuals wish to be removed from a contact list, they may have this done by contacting the Manager, Resource Development, and this request will be accommodated gladly.

**Website and Electronic Commerce:** The Bloom Group uses password protocols and encryption software to protect personal and other information it receives when a product or service is requested and/or paid for online. The Bloom Group's software is routinely updated to maximize protection of such information.

## b) Information Sharing/Release Of Information

Information about persons served will be shared between programs in The Bloom Group in situations where there may be a duty to warn, a safety concern, or a child protection concern. In cases where there is an intra-Bloom Group referral, information will be shared

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between services of The Bloom Group – this is a requirement of intra-Bloom Group referral which persons served should be advised of at orientation.

On occasion, mandated persons served may request that The Bloom Group staff share information with other persons or organizations. Such requests should be referred to the supervising social worker in order to make an appropriate decision. In all such cases, written consent of the client is required.

Persons served may verbally request to view their personal case records at any time. The following procedures apply:

- Records must be viewed in the presence of the assigned worker.
- Case records may only be viewed on The Bloom Group premises.
- In no instance will original case records be released to any person for removal from The Bloom Group premises, unless ordered by a court of law, or unless specified by a program contract.
- In the latter case, persons served must be informed of this arrangement at orientation.

Persons served may apply to have a copy of their case record released to them under the Freedom of Information and Protection of Privacy Act or the Personal Information Protection Act. This must be done in writing using forms provided under either Act. These forms can be found on the website of the Information and Privacy Commissioner for BC at <http://www.oipc.bc.ca/>. The Bloom Group has 30 days following receipt of a written request in which to consider and make a decision about releasing records. In addition, the following procedures apply:

- Managers/supervisors must be advised of all requests for release of case records.
- The written request along with the case record must be forwarded to the Privacy Officer for approval; this should be done by the manager/supervisor.
- The Privacy Officer will review the record and consult with the manager/supervisor about any issues in releasing information contained in the record; the Privacy Officer will assist the manager/supervisor to redact the record as appropriate.
- The record will then be returned to the manager/supervisor who will arrange for release of a copy of the record to the person served as approved by the Privacy Officer.
- In some instances, copies of records may not be released – this is typically in a situation where the Privacy Officer and the manager/supervisor determine that harm may be caused to one or more parties if information from the case record is released.

### c) Information for Volunteers, Donors, and Supporters

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