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Review	Annually

Privacy Policy

Clarington Girls Hockey Association (CGHA) is a registered not-for-profit corporation in the Province of Ontario whose purpose is to administer and promote organized minor hockey in the Municipality of Clarington through a volunteer Board of Directors. To enable the CGHA to do this, the collection and use of personal information from its members is required.

CGHA is committed to protecting the information it obtains and meeting or exceeding all federal and provincial legal requirements. The following principles, taken from the Personal Information Protection and Electronic Documents Act (PIPEDA), describe how we will assure the privacy of personal information:

Principle 1: Accountability

The CGHA Board of Directors is responsible for the protection of information it collects, uses, and/or discloses. The President of the CGHA Board is accountable for the practices of the CGHA. In the absence of the president, the secretary shall assume responsibility.

Principle 2: Identifying Purposes

The CGHA collects personal information from its members in order to organize and carry out CGHA hockey activities and events. Members include players (and/or their legal guardians if under the age of 18), coaches, team managers, trainers, referees/timekeepers/officials, and the Board of Directors.

The collection of information, that is, information that can be used to identify an individual or information about an identifiable individual, will be limited to that which is needed for the purposes of organizing and administering hockey and league activities and will depend on the nature of the member's role with the CGHA (e.g., player, board member).

Information needed may include: name, date of birth and/or birth registration document, gender, address, contact information (phone, email, etc.), medical conditions, medical assessments, and medical events (e.g., conditions affecting play such as concussions or conditions that could affect play such as diabetes), registration numbers or course certifications (e.g., from provincial hockey or certification bodies), and qualifications (e.g., previous experience or teams, criminal reference or vulnerable sector check, training certifications). Information will be primarily collected during member registration or application and may be appended as new information becomes available throughout the lifecycle of the member (e.g., skills assessments, updated medical information as needed, updated certifications).

Principle 3: Consent

Member information will be collected by both express and implied consent processes. During the registration/application of members, express consent through acknowledgment of this Policy will be obtained. Members who provide subsequent information offer so with implied consent, that is the transfer of the information is acknowledged to be consent to collect and retain the information, with use of information still limited as described in this policy.

Members have the right to withdraw their consent to collect, retain, or disclose personal information through written notice to the CGHA President, or in the absence of or in the event of a conflict of interest with the President, to the Secretary. However, the withdrawal of consent or the refusal of consent may require the CGHA to revoke membership and/or the offering of any role, service or program where the information may be required (e.g. player information is required for insurance, medical clearance is required following a concussion, vulnerable sector check is required for working with minors).

Principle 4: Limiting Collection

The CGHA will limit the collection of personal information to that which is required for the purposes of administering hockey and CGHA events.

Where practical, the CGHA will strive to use or collect non-identifiable information in lieu of identifiable information (e.g., feedback collected in a blinded fashion).

Principle 5: Limiting Use, Disclosure, and Retention

The CGHA shall not use or disclose personal information for purposes other than those for which it was collected or where compelled by law.

Disclosure may be required to register a member with an oversight body (e.g., the Ontario Women's Hockey Association) or resource body (e.g., the Municipality of Clarington) to enable the administration of CGHA activities. Only the minimum amount of information required will be provided.

Within the CGHA, personal information access will be limited to those individuals who require it to perform their role. Team officials (e.g., the head coach and trainer) will be provided with player information, including medical information, to enable the administration of a team. Board roles will have access to member information where required in the service of their duties (e.g., program vice presidents will have access to player and coach information, the registrar will have access to player, coach, and team information, and the members of the Ethics and Discipline Committee will have access to complaint information). CGHA members who have access to personal information will acknowledge and agree to adhere to this policy (e.g., through their application or registration).

In the public domain, minor members will only be identified by their first name and the first two initials of their last name OR their last name and the first two initials of their first name (e.g., team lists on the CGHA website).

Service providers to the CGHA may have access to personal information only if: a) it is specifically required for the scope of their work (e.g., legal, accounting), b) it is limited to the minimum information required; c) its use is limited by a privacy policy maintained by the provider (e.g., destruction); or it will be immediately used and not retained.

CGHA does not sell, trade, or barter the personal information of its members.

Personal information will be destroyed when no longer required in support of the administration of CGHA hockey or events (e.g., deletion, shredding). In the absence of other legal constraints, personal information shall be retained for up to seven (7) years, consistent with financial record retention requirements.

Principle 6: Accuracy

Personal information must be as accurate, complete, and up-to-date as possible in order to properly satisfy the purpose for which it is required to be used. To accomplish this, personal information will be collected directly from members whenever possible.

Members have the right to request information held by the CGHA be updated or amended for accuracy, and the CGHA will update information in good faith. If the accuracy of the information is in question, the CGHA retains the right to request updated information or supporting information, should the information be required to properly administer its activities (e.g., following a concussion, medical clearance is required prior to return to play).

Principle 7: Safeguards

The CGHA will protect personal information in its possession according to the sensitivity of the information. This includes employing commercially reasonable practices consistent with the voluntary nature of the CGHA and the information medium, inclusive of but not limited to: electronic encryption, specific user accounts with password controls, a dedicated board member communication platform, the use of anti-virus software on CGHA devices, and the use of locked rooms and cabinets.

Access controls and physical records or devices will be collected when no longer required (e.g., removing online accounts and collecting keys and papers at the end of a board member's term).

Principle 8: Openness

The CGHA will make this policy available to the public by posting it to the CGHA website.

Principle 9: Individual Access

Upon request, the CGHA shall provide access to personal information in its possession to the individual to whom it relates or to the parent or guardian of such an individual under the age of 18. The CGHA will disclose the source(s) of information as well as information disclosures.

The CGHA will strive to honour all access requests within 30 days. The CGHA reserves the right to charge a nominal fee representing expenses in retrieving records (e.g., from the legal archive).

The CGHA reserves the right to confirm the identity of any individual making a request for personal information prior to disclosure.

Access requests can be made to the President, or, in the absence of or due to a conflict of interest with the President, to the Secretary.

Principle 10: Challenging Compliance

Members are able to challenge the CGHA's compliance with the principles of this policy. Challenges can be made to the CGHA president, or in the absence of or conflict of interest with the president, to the secretary.

The CGHA Executive Committee shall investigate all complaints received. If the complaint is found to be justified, the CGHA must take appropriate steps to correct the problem and prevent it from happening again (for example, by updating its safeguards, restricting access, and so on).