



# POLICIES AND PROCEDURES ORGANIZATIONAL MANAGEMENT

SSBC Policies and Procedures Manual #1 of 3

## SECTION G – COMMUNICATIONS

### G-1 POLICY: Communications

SSBC is committed to assisting its member Clubs by keeping them informed about the business of Speed Skating. This policy includes minimum standards required to ensure accurate distribution, protection of personal information, code of conduct, strong brand recognition and withdrawal privileges and deadlines. This policy applies to all members, staff and executive of SSBC.

1. SSBC office will be responsible for maintaining current club contacts based on information submitted by member clubs.
2. Electronic communication outside of SSBC shall always be properly referenced (name, title, etc.) as to the sender's position within the Association.
3. All correspondence (electronic or any other method) must be in full compliance with the Association's Code of Conduct and respective of the Association's Harassment Policy.
4. All internal communications between members of the Board, Staff and Contractors are to be considered "confidential" and, without express written permission of the sender, cannot be passed on in any form, in whole or in part, to anyone else.

### G-1 PROCEDURE: Communications

- ~~1. The Sport Administrator will be the conduit for the information flow between the Clubs and the Board, SSC, Provincial Branches and other organizations.~~
- ~~2. In order to ensure the timely exchange of information with the clubs, the Sport Administrator will not be able to take on a role of facilitating communications between clubs. That will remain a club responsibility.~~

**Rationale:**  
Updated to reflect current procedures.

3. Alternate avenues of communication **to the membership of SSBC** are:
  - a. ~~the SSC Newsletters~~
  - b. ~~pre and periodic in season Bulletins~~
  - c. SSBC Website
  - d. SSBC Facebook page **and Instagram**
  - e. ~~the use of twitter and other forms of social media~~ **such as Facebook Groups and YouTube.**

**Rationale:**  
Updated to reflect current procedures.

- f. Group email messages
  - g. Other methods as required.
4. ~~With mass digital electronic communication and risks protected by the BC Personal Information and Privacy Act, all mass e-mails to club contacts and email groups shall be blind copied with a description to which groups it was mailed to.~~ The sender is responsible for ensuring privacy is maintained for all recipients of an email message when appropriate. This may require the use of the blind copy function to preserve email address privacy. Refer to the SSBC's Personal Information Protection Policy.
  5. ~~All province wide mass emails to clubs including National Competition notices, information deemed to be of interest to the full membership, etc. shall be sent by blind copy through SSBC office to ensure timely, accurate and private distribution.~~

## G2 - POLICY: Personal Information Protection Policy (Updated May 2022)

### 1) OBJECTIVE

- a) The intent of the British Columbia Speed Skating Association's (SSBC) Personal Information Protection Policy (PIPP) is to help individuals understand how their personal information is managed at and by SSBC.
- b) This Policy is designed to comply with applicable privacy legislation in British Columbia (Personal Information Protection Act SBC 2003 Chapter 63-PIPA) and Canada (The Personal Information Protection and Electronic Documents Act – June 2015 – PIPEDA)

### 2) FIELD OF APPLICATION

- a) This Policy applies to, but is not limited to, all employees, directors, volunteers, coaches, athletes, officials and all other members of SSBC.
- b) This Policy applies only to information collected during the course of SSBC related activities.
- c) Should this Policy not address a specific situation, individuals are expected to contact the SSBC Executive Director for guidance or clarification.

### 3) DEFINITIONS

- a) The terms: “all employees, directors, volunteers, coaches, athletes, officials and all other members” are those described within the By-Laws and Policies and Procedures of SSBC.
- b) Funders: A governmental or quasi-governmental organization which provides funding for high performance programming.

### 4) PRINCIPLES

- a) The SSBC PIPP is designed to comply with applicable privacy legislation in British Columbia (PIPA) and Canada (PIPEDA) It incorporates the following 10 principles:
  - Accountability
  - Identifying Purpose
  - Consent
  - Limiting Collection
  - Limiting Use, Disclosure and Retention
  - Accuracy of Personal Information
  - Safeguarding Personal Information
  - Openness
  - Access to Personal Information
  - Challenging Compliance
- b) If changes to the Policy are required in the future, those changes will be provided in writing through updates to our official PIPP and communicated according to Section 8 of this Policy.
- c) It is SSBC’s intent that individuals will always know their personal information that is collected, how it is used and how it is protected.
- d) When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified to an affected individual prior to use.

### 5) POLICY STATEMENT

- a) SSBC is committed to protecting the privacy of individuals from whom it collects personal information for the conduct of SSBC activities.

### 6) PROVISIONS

- a) Accountability

SSBC is responsible for maintaining and protecting the personal information under its control. Accountability for this function within the organization is held by the Executive Director of SSBC.

b) Identifying Purpose

SSBC will identify to an individual the purposes for which personal information is collected at, or before, the time the information is collected. Generally, SSBC collects personal information for the following purpose:

- registration of Members as defined in the By-Laws and Policies and Procedures of SSBC.
- to process registrations for competition, reporting to funders and running reports to capture member numbers;
- to manage and develop SSBC's business and operations, including but not limited to personnel and employment matters and affairs with partners, funders and sponsors;
- to determine an individual's entitlement to SSBC's services.
- to inform individuals about SSBC programs and services that SSBC believes may be of interest to them.
- to better understand an individual's interests in SSBC's products and services.
- to develop, enhance or improve programs and services to better meet the needs of SSBC members as defined with the By-Laws and Policies and Procedures of SSBC..
- to meet legal and regulatory requirements; and
- to address specific circumstances that require such information to be collected and used.
- SSBC collects or may collect personal information from individuals during the course of normal activities and for membership management. Information collected is but not limited to:

- SSBC/SSC member number
  - first name
  - last name
  - Gender
  - language preference
  - birth date
  - Address
  - phone number(s)
  - e-mail address
  - Parent or Guardian's name (if a Minor as defined by the Government of BC)
  - Parent or Guardian's address (If a Minor as defined by the Government of BC)
  - Medical information
- Additional information obtained may include levels of interest for our services and topics, and transaction activity with SSBC.
  - Credit card information or banking information may be collected and utilized for payment transactions for registration only. This information will not be stored without your consent,
  - Additional information obtained may include levels of interest for our services and topics, and transaction activity with SSBC.
  - Credit card information or banking information may be collected and utilized for payment transactions for registration only. This information will not be stored without your consent,
  - SSBC/Speed Skating Canada uses cookies. A cookie is a small piece of information that is sent to your computer when you access a Web site. SSBC/Speed Skating Canada utilizes a session cookie which is stored temporarily in your computer's memory and allows you to remain logged in while using the SSBC/Speed Skating Canada websites/databases – i.e. a person is not required to continuously log in as he or she navigates the pages on the website because these cookies are used. A session cookie is destroyed as soon as the browser is closed.

c) Consent

- i) An individual's knowledge and consent are required before SSBC is allowed to collect, use or disclose his or her personal information.

- ii) Where possible, SSBC/SSC will obtain consent directly from the individual concerned at the time of collection of personal information.
- iii) An individual has the right to withdraw consent at any time by providing reasonable notice to the SSBC Executive Director. If a request to withdraw consent requires that SSBC delete an individual's registration information, SSBC will no longer be able to provide the programs, services or products for which an individual has subscribed. Cancellation will be subject to the terms and conditions of the registration or services provided, as applicable.
- iv) By registering in SSBC, or subscribing to any potential association reports or member services, or otherwise indicating approval, individuals consent to the collection and use of their personal information for the purposes identified in this Policy.
- v) SSBC will not require an individual to consent to the collection, use or disclosure of personal information beyond what is required to provide its products, programs or services.
- vi) In limited circumstances, SSBC may use or disclose personal information without the knowledge or consent of the individual, for example, as required by governmental bodies acting with authority, or as authorized or required by applicable legislation.
- d) Limiting Collection
  - i) SSBC collects only the information that is necessary for the purposes outlined in this Policy.
- e) Limiting Use, Disclosure and Retention
  - i) SSBC does not use personal information for purposes other than those for which it was collected, except with an individual's consent or as required by law.
  - ii) Once personal information is no longer required to fulfill the identified purposes or other legal requirements, it will be destroyed, deleted or made anonymous.
  - iii) Personal information is shared with external service providers only to the extent required for the provision of such services. Furthermore, SSBC does not sell personal information to a third-party organization. In certain circumstances, SSBC allows basic contact information to be shared amongst Members. Examples of this include providing skater lists for competitions to other participants

or sharing contact information amongst members of the SSBC administrative networks, or Boards of Directors and staff, to facilitate ongoing communication.

- iv) Personal information is retained only as long as necessary for the fulfillment of the purposes stated in this Policy.
- v) Personal information collected through IceReg will be used by system administrators in member Clubs and at the SSBC to process registrations for competition, to generate reports to funders, to promote sponsor products or services, to generate statistical reports and to capture member numbers.

- vi) Personal information may be disclosed pursuant to the Complaints and Discipline process to aid in the investigation, examination and rendering of a decision. In some cases this may allow for the publication of the names as part of the disciplinary decision.

**Rationale:**  
Added to align with Complaints and Discipline policy.

f) Accuracy of Personal Information

- i) Personal information is kept as accurate, complete and up to date as necessary for the purposes for which it is to be used. Individuals are encouraged to provide updates to their personal information as changes occur to enable continued service from SSBC.
- ii) The personal information of individuals registered with SSBC and Speed Skating Canada can be reviewed and modified, as required.

g) Safeguarding Personal Information

I. Personal information, whatever its form, will be protected by security safeguards appropriate to the sensitivity of the information. The safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. The measures of protection include:

ii. physical measures, for example, locking filing cabinets and restricted access to offices;

iii. organizational measures, for example, limiting access to the personal information on a “need-to-know” basis;

iv. technological measures, for example, the use of passwords and encryption; and

v. procedural measures, for example, the shredding of sensitive personal information when applicable.

IceReg (SSC) and the skater database (SSBC) will have the following specific security measures implemented to protect an individual's electronic personal information:

- All SSC information is stored in a dedicated SSC Database residing in the Interpodia Data Centre, under contract to Speed Skating Canada.
- All SSBC information is stored in a dedicated SSBC database residing with Adroit Technologies (ATWS).
- The SSC database is located in a High Security Zone that is only accessible by secure VPN connection, and to the web servers in the Demilitarized Zone.
- This Data Centre location is physically secure and located in what was formerly a bank.
- The Data Centre is 100% Canadian owned and operated.
- Backups of the database are performed regularly but reside within the High Security Zone.
- From time to time, or upon request, an offsite backup may be initiated for disaster recovery purposes.
- When doing so all information is encrypted and the information will be stored in a location with comparable security.

#### h) Openness

SSBC is committed to being open about its policies and practices with respect to the collecting and handling of personal information.

This Policy is available on the SSBC Website.

If additional information is required by an individual, requests for such information may be made by writing to the Executive Director of SSBC.

#### i) Access to Personal Information

Individuals may request a copy of their personal information held at SSBC/Speed Skating Canada by submitting a written request to the SSBC Executive Director.

Acceptable proof of identification is required before such information is provided.



If the information is inaccurate, an individual may request that it be reviewed and, if inaccurate, changed by writing to the SSBC Executive Director.

j) Challenging Compliance

An individual can challenge compliance with the above policy by providing written details of the challenge to the SSBC Executive Director.

**7) REVIEW AND APPROVAL**

- a) The SSBC Board of Directors and the Executive Director shall review this policy biennially.
- b) This Policy and any amendments to it require approval by the Board of Directors prior to its coming into force.

**8) COMMUNICATION OF THE POLICY**

- a) This Policy will be posted in the Policies and Procedures Governance section of the SSBC Website.