

**To: Council of Provincial Commissioners**  
**From: Susan Bower, Director – Corporate Services**  
**Re: Best Practices for Emailing Personal Information and Provincial Annual Records Destruction**

We are in the process of assessing and developing a full set of information management policies, including those pertaining to the protection of personal information and electronic file management as part of Strategic Priority #4, Digital Transformation.

In the interim, we have compiled the following information to address your current issues and expand upon information delivered at the recent Board and PC orientation.

### **Corporate Data and Personal Data**

Girl Guides Canada is in the business of providing services to Girls and to their Parents. We are categorized as voluntary sector organization – meaning members join on a voluntary basis and participate in activities on a volunteer basis, and we are led by volunteers. Thus participants voluntarily provide their personal information as a basis for participating in the activities and services of the organization. In this environment, personal information such as name, address, email, telephone number become corporate data for the purposes of carrying out membership association activities. There is implied consent that when, for instance, a parent provides this information about a family member the personal information will be shared with the volunteers. Nonetheless, Girl Guides Canada has set in place guidelines for the protection of personal data so that it is not unduly exposed to parties that do not have a need to use it in the activities of the organization.

### **Best Practices for Emailing Personal Information**

GGC is entrusted with the safety and security of our members' personal information. We use this information to manage screening, membership and training requirements as well as to communicate with and deliver programming to our members.

GGC staff and volunteers may not share, sell or trade a member's personal information, including email lists, with outside organizations except where required by law or to assist third party service providers working with GGC.

Volunteers and staff who are responsible for handling personal information are required to take proper steps to protect the information in their custody. Best practices for emailing personal information include:

1. Regularly delete sent items.
2. Do not use email as the storage platform for important records, for example, save emails lists to a file instead.
3. Destroy paper and electronic copies of records when they are obsolete or according to the forms retention schedule
4. If you become aware of any suspicious activity on your Guiding related email account such as spam or suspected hacking please notify Anita Hannam Exec. Asst., Operations, [hannama@girlguides.ca](mailto:hannama@girlguides.ca).
5. Include a statement regarding the protection of personal information in communications, such as "this personal information should only be used for the purpose for which it was sent, please destroy it and any copies when you no longer need the information"

## Provincial Annual Records Destruction

The National Forms Retention Guidelines were created in 2004 as a component of privacy compliance. Since 2008 we have sent provincial offices lists of files that are scheduled to be destroyed each year. Generally, membership files are destroyed based on the year the membership ends and event files are destroyed based on the year of the event.

Every year the national office sends:

- an excel list of the membership files scheduled to be destroyed (based on queries in iMIS)
- a list of event forms scheduled to be destroyed based on the year they were created
- an updated copy of the Forms Retention Schedule (attached)

Confirmation of the destruction of these files is included as Schedule S in the provincial Compliance Package.

## Privacy Resources for your reference

GGC Privacy Statement [https://www.girlguides.ca/web/GGC/Privacy\\_Policy/GGC/Privacy\\_Policy.aspx](https://www.girlguides.ca/web/GGC/Privacy_Policy/GGC/Privacy_Policy.aspx)

Overview and Best Practices Tips Canadian Anti-Spam Law (CASL):  
[https://www.girlguides.ca/web/Documents/GGC/CASL\\_Overview\\_and\\_Best\\_Practices\\_Tips.pdf](https://www.girlguides.ca/web/Documents/GGC/CASL_Overview_and_Best_Practices_Tips.pdf)

Privacy Breach Procedures:  
<https://www.girlguides.ca/WEB/Custom/BSIDocumentSelector/Pages/DocumentViewer.aspx?id=tbAvUQIA15yqFsDhUuM4gu%252fty2koLgXH0dkK5aD7XV0LY7rdpaiWoGfjJl9r1Slnk4wggFJnPAwgd47RX3r8dvpHZjybsM1FBTq0uInvjgySdJYxhoTY4RP%252f4jMYnRn2giEEHcyG1ctO4vv9JXbIPqVGB6HPDMMTTIIOXvDSTV3DNEjAWUwQgSQ%253d%253d>

Safe Guide: What to do with your Safe Guide Forms and Protecting Your Paperwork p 46-48  
(<https://www.girlguides.ca/WEB/Documents/GGC/volunteers/resources/safe-guide.pdf>)

Guiding Essentials : 9.2 Privacy, 9.3 Records Retention p 63-65  
(<https://www.girlguides.ca/WEB/Custom/BSIDocumentSelector/Pages/DocumentViewer.aspx?id=tbAvUQIA15yqFsDhUuM4gu%252fty2koLgXH0dkK5aD7XV3CVckhe5GXUUEtRJCFUa7Tpuknl6futrGzZhmhDCq2YZ1RXqX9qOtgz5xGc%252b1kgNjX0brSwW1csXJd6u027CZ0IG29Tklw4CEilfX72WuqkqiCG%252bFRf6L1UdBS8%252bQohKR08AJ5ISMe85kROkHA2A4%252b>)

The GGC Retention Schedule November, 2017 is attached