

St. Philip Parish
Richmond, ON

Disclosure of Parishioner Contact Information Policy

1. Objective

The Disclosure of Parishioner Contact Information Policy describes the background, principles, policies and procedures associated with the management of St. Philip Parish's Parishioner Contact Information and the disclosure of such Contact Information to other Parishioners and Parish Groups.

2. Definitions

Contact Information – the name, physical address, mailing address, telephone number and/or e-mail address of a *Parishioner* that, by having any or all of these pieces of information, would allow another person to communicate with that parishioner.

Disclosure List – means a listing of all *Parishioners* (together with their respective *Contact Information*) who have given their consent to have said information released to a Requestor, as provided for under this *Policy*.

Parish – means St. Philip Parish of Richmond, Ontario.

Parish List - a collection of files maintained by the *Parish* that contain contact and other information for all Parishioners.

Parishioner – means any individual whom considers themselves to be part of the *Parish* community and who reasonably resides within the *Parish's* geographical boundaries, or are registered with the *Parish* on the official Parish List regardless of whether or not they are a holder of a *Parish* envelope offering box.

Parish Group – means the Knights of Columbus, Catholic Women's League, Society of Saint-Vincent de Paul, or any other group comprised primarily of *Parishioners* and that operates within the *Parish* with the approval of the Pastor.

Parishioner Consent Form – see Appendix A.

Policy – means the Disclosure of Parishioner Contact Information Policy

Request to Obtain the Parish Disclosure List Form – See Appendix B

Requestor – means a *Parishioner* or *Parish Group* who submits a request to obtain the *Contact Information* of a *Parishioner*.

3. Background

The *Parish*, a Catholic church located in Richmond and within the City of Ottawa, strives to create and build a sense of community and fellowship with others through various events, fundraisers, and other activities.

Through the course of carrying out its activities, the *Parish* collects the personal *Contact Information* of a *Parishioner*. The collection of this information assists the Pastor, other clergy members and other laypersons to carry out their respective ministries within the *Parish*.

It would be of assistance to the *Parish* that, from time to time, a *Parishioner* or *Parish Group* be allowed to contact other *Parishioners* directly to inform them of an activity, to solicit from them cash or in-kind donations, or to make other requests of them, as approved by the Pastor.

The *Parish* comprises individuals and *Parish Groups* who have, from time to time in the past, ask for and received *Parishioners' Contact Information*, and have used such *Contact Information* for the purposes of making such requests from the *Parish* community.

The *Parish*, however, as a holder of such *Contact Information*, is obligated under civil law to safeguard and maintain the confidentiality of that information and is under no obligation to release to anybody or any group any information for any purpose not directly related to the operational or pastoral needs of the *Parish*.

Therefore, the *Parish* wishes to adopt the *Policy* to recognize the desire of *Parishioners* to have their *Contact Information* released and the desire of *Requestors* to directly contact *Parishioners*.

4. Principles

The *Policy* is based on four overarching principles:

1. The *Parish* has been entrusted with *Parishioners' personal Contact Information*, as may be required from time to time under diocesan or other civil laws and regulations. As a holder of this information, the *Parish* is required to safeguard it in a secure and confidential manner and to use such information only when needed for *Parish* operational purposes;
2. *Parishioners*, seeking to build a sense of Catholic community and fellowship with each other, may choose to have their *Contact Information* released to *Requestors* so they can be contacted, made aware of, or receive solicitation by, that *Requestor*;
3. The *Parish's* obligation to safeguard the privacy and confidentiality of a *Parishioner's Contact Information* can be effectively balanced with a *Parishioner's* desire to have said information divulged through proactively obtaining a *Parishioner's* consent to having said information divulged and in accordance with this *Policy*; and,
4. *Parishioners* have the right to know to whom their *Contact Information* has been released, to correct and update said information, and to withdraw consent to the release of said information at any time and for any reason.

5. Policy and Procedures

1. The Disclosure List

1.1. The *Parish* currently maintains a *Parish List*.

1.2. The *Disclosure List* will be developed and maintained using *Contact Information* contained in the *Parish List*.

1.3. The *Disclosure List* will contain the following specific pieces of *Contact Information*:

- First and last name(s) of individuals/family;
- Physical Address (column);
- Mailing address (column);
- Telephone number(s) (column);
- E-mail addresses (column);
- Consent Given (column), where an "X" will be placed to indicate consent has been given for contact;
- Preferred Method of Contact (column);
- Date consent given (column); and,
- Date consent rescinded (column).

2. A physical file will be maintained in the Parish Office that will include:

- Original signed copy of the Policy, as approved by the Pastor;
- Original copies of completed and signed *Parishioner Consent Forms*, including any amendments and rescissions received with respect to those forms (in chronological order); and,
- A register containing the disclosure history of the *Disclosure List*, that includes Requestor/signed declaration/pastor approval forms and copy of *Disclosure List* that was released.

3. Obtaining Consent

3.1. *Parishioners* who consent to the disclosure of their *Contact Information* will complete and sign a *Parishioner Consent Form* indicating they consent to having their *Contact Information* disclosed (see Appendix A).

3.2. The *Parishioner Consent Form* will contain the following clause:

"I (we) consent to having our *Contact Information* (as defined in the *Policy*) released to other *Parishioners* or *Parish Groups* who have been approved by the Pastor in accordance with the *Policy*. I (we) understand that these individuals or groups may want to provide information on upcoming events/activities in the *Parish* and/or solicit donations and other forms of support as part of their *Parish* programs and ministries. I (we) understand that we have the right to withdraw this consent at any time, at my (our) sole discretion and in writing, by contacting the *Parish* office. I (we) understand that a copy of the *Policy* is available on the *Parish* web site and can be obtained from the *Parish* office."

4. Revoking Consent

- 4.1. *Parishioners* who have previously given their consent to the disclosure of their *Contact Information* can revoke that consent by completing a new *Parishioner Consent Form* and indicating on that form that they wish to revoke their consent.
- 4.2. The Parish Office, upon receiving a revocation request, will update the *Disclosure List* and file the revocation request with the originally-submitted *Parishioner Consent Form* that granted the consent.

5. New Parishioner Information Form

- 5.1. The New Parishioner Information Form will be modified to include the consent clause and necessary consent details as contained in section 5 of this *Policy*.
- 5.2. A copy of the New Parishioner Information Form will be retained in the *Disclosure List* file as evidence that consent was given.

6. Initial Implementation (January 2015)

- 6.1. *Parishioners* of the *Parish* that are on the *Parish List* at the time of the adoption of this *Policy* will be asked to complete a *Parishioner Consent Form* (see Appendix A of this *Policy*).
- 6.2. *Parishioner Consent Forms* will be pre-filled using *Contact Information* contained within the *Parish List* and will be made available for pick-up (in a sealed envelope) at the back of the *Parish* church along with their annual charity income tax receipt (expected in late January 2015).
- 6.3. *Parishioners* will be asked to complete the form and return them to the Parish Office.
- 6.4. Upon receiving the completed *Parishioner Consent Form*, the Parish Office will update the *Parish List* with each *Parishioners'* consent details.
- 6.5. After the lapse of the specific period of time, the Parish Office will retain the remaining *Parishioner Consent Forms* to those *Parishioners* who have not picked up or returned their forms.

7. Making a Request

- 7.1. A *Requestor* wishing to obtain the *Disclosure List* will complete the *Request to Obtain the Parish Disclosure List Form* and submit it to the Parish Office (see Appendix B).
- 7.2. The *Request to Obtain the Parish Disclosure List Form* will provide the *Parish* with:
 - The name and other contact information of the *Requestor*;
 - A description of what *Contact Information* is being requested (e.g. e-mail, telephone numbers, etc.);
 - The reasons for making the request and a description of what the contact information will be used for;
 - The date(s)/duration for which the *Contact Information* is needed;
 - The name(s) and contact information of other individuals who will have access to and will be using this information;
 - The number of copies that are needed of the requested information; and,
 - A signed declaration given by the *Requestor* stating that:

- The information will only be used for the purposes specified in the request;
 - The information will be kept confidential and appropriate safeguards put in place to ensure said confidentiality;
 - The *Requestor* has read the Policy and agrees with it;
 - The *Requestor* will not make any copies of the requested information;
 - The *Requestor*, if distributing the Disclosure List to other named individuals, will be responsible for ensuring those who have access to the information are aware of this policy and will abide by them; and,
 - The *Requestor* will return the information to the Parish Office by the date indicated in the request.
- 7.3. Requests and the reasons for them must conform to Parish and Diocesan regulations. This specifically includes the Diocesan regulation that limits fundraising within the *Parish* to Parish operating expenses or Parish capital projects, and that any other fundraising not done for these two permitted purposes will require the written approval from the Archdiocese of Ottawa before the Disclosure List is released.
- 7.4. All requests must be made in writing and be approved by the Pastor.
- 7.5. Once approved by the Pastor, the Parish Office will produce the *Disclosure List* containing only the required/requested information and will produce and number each copy of the *Disclosure List*.
- 7.6. The Parish Office will contact the *Requestor* to arrange pickup of the *Disclosure List*
- 7.7. The Requestor will return all copies of the *Disclosure List* on or before the due date.
- 7.8. The Parish Office will ensure all copies have been returned, will associate one copy with the request and retain on file and destroy all other copies (if applicable).
8. External Organizations
- 8.1. It is understood that only those identified as being a *Parishioner* of the *Parish* or that constitute a *Parish Group* will be permitted to submit a request to obtain the *Disclosure List*

6. Recommendation and Approval

As required under Canon 537 of the Code of Canon Law and under Chapter IV, Article VI of the Archdiocese of Ottawa's Administration Manual, the *Parish's* Parish Finance Council is responsible for assisting and advising the *Pastor* as to the establishment of guidelines for the temporal administration of the *Parish* and in accordance with the principles governing sound administration.

It is under this authority that the *Parish's* Parish Finance Council hereby advises and recommends to the *Pastor* the approval and implementation of this policy within the *Parish*, by vote dated October 21, 2014, as signed below by the Chair, Parish Finance Council.

The *Pastor*, by authority vested in him as the personal representative of the Archbishop of Ottawa within the *Parish*, hereby accepts the advice and recommendation presented to him by his Parish Finance Council, and calls for the policy's implementation within the *Parish* as soon as may practically be possible.

Fr. Robert Poole
Pastor
Richmond, ON

Patrick McIver
Chair, Parish Finance Council
Richmond, ON

7. Appendices

Appendix A - Parishioner Consent Form

Appendix B - Request to Obtain the Parish Disclosure List Form