



**North Perth Community of Character
Character Council
Procedure for Reviewing a Privacy Policy Complaint
Approved June 16, 2020**

If an individual thinks that their private information has been mishandled by the North Perth Community of Character, they are encouraged to contact the Community of Character to report the concern.

Step 1: Timely Response to Complaints

The Complainant should be asked to submit their complaint to writing (or an alternative format) using the attached form. Once the complaint has been received, the Community of Character will review and respond within 30 days.

Step 2: Conduct an Adequate Investigation

The Community of Character will investigate the complaint to determine if there has been a violation of the North Perth Community of Character Privacy Policy or any applicable federal or provincial legislation. This investigation will include fact finding and root cause analysis to understand the depth of the incident as well as a review of internal policies and procedures to determine if there was a violation; identify any persons who accessed, used or received the personal information, including interviewing and obtaining statements from staff or volunteers that were involved in the incident; and reviewing the nature and extent of the personal information involved.

Step 3: Correct and Mitigate Harmful Effects

If the investigation substantiates a breach has occurred, then the North Perth Community of Character will work to mitigate the harmful effects of the breach. The initial action will include a correction of the breach if possible, to stop any further disclosure or uses of unauthorized personal information. By completing an investigation, the Community of Character will understand what caused the breach and determine ways of preventing similar breaches in the future. Mitigation efforts may include updating policies and procedures, providing refresher compliance training for staff, and/or implementing new safeguards to prevent noncompliance.

Step 4: Get Documentation in Order

The Community of Character will document and record all investigative efforts including the initial complaint, the internal investigation and determination, documents reviewed and witness statements obtained, actions taken to mitigate the breach, and any disciplinary actions taken.

Step 5: Follow up with the Complainant

The Privacy Officer or appointed designee should notify the complainant of the findings and resolution of the complaint.

