

**Comments on PDPC Proposed Advisory Guidelines for the Social
Service Sector dated 16 May 2014**

Name of Organisation: HELP Family Service Centre

Contact Person: Mr Christopher Yip

Email: hadmin@helpfsc.org.sg

Summary

There are four comments; namely, consent that is not valid, consent from client who is mentally unwell, withdrawal of consent and example for specified message.

Comments

1. On page 5, Para 2.3, it will be good if the term Consent is not valid is explained clearly. During the PDPA briefing organised by NCSS and conducted by PDPC on 27 Mar 2014 at Social Service Institute, an example was used in the presentation on not valid consent though the presenter had later clarified that the example used is inappropriate. So when a client seeking help from a VWO and the client understand that because sponsoring organisation and the VWO needs to account for the KPIs and to their stakeholder, does it mean that even if the client sign the consent for the VWO and/or sponsoring organisation to use the client photos is this consent considered as valid? It is easy to have a separate consent for VWO media coverage (not affecting service given to client). However, sponsoring organisation might put media coverage as a criterion for providing funding. Elaborating and showing this example will be beneficial, as most VWOs might be faced with this situation.
2. On page 14, Para 2.21, there is a guideline for client who is a minor. Appreciate if PDPC or relevant organisation can provide a guideline for client who is mentally unwell. Understand that MSF is working on this matter.
3. On page 19, Para 5.3, it will be good if the guideline elaborate on withdrawal of consent. If a client withdrawal his/her consent, what should VWO do if the client requests to withdrawal the client's data from NCSS database (ECMS)? Since NCSS/MFS is exempted from PDPA, please advise on the course of action. Understand that NCSS is still looking into this matter.
4. On page 22, Para 6.9, it will be good to add an additional example to explain if VWO MNO calls/send out sms asking donors to get charity tickets for charity dinner and stated that the money collected will be treated as donation either fully or partially.

Conclusion

Will appreciate if PDPC and/or relevant organizations (NCSS/MSF) can address the above 4 comments as soon as possible as PDPA is going to be effective in last than a month's time and there is not much time left for implementing changes needed. VWOs need to update their SOP and documentations, among others, to be in line with PDPA.