



3.2.25 PERSONAL INFORMATION PROTECTION

POLICY

Community Living Association for South Simcoe is committed to safeguarding all personal information entrusted to us. CLASS will manage personal information in accordance with applicable privacy legislation. This policy applies to Community Living Association for South Simcoe and to any person providing services on our behalf.

PROCEDURE - PEOPLE RECEIVING SUPPORT OR SERVICES

Personal Information means information about an identifiable individual. This includes a person's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, employment or confidential health records.

CLASS will collect only the personal information that is needed for the purposes of providing services to people we support, including personal information needed to:

- Deliver requested services;
- Admit a person into a program; and
- Send out association membership information.

CLASS will collect personal information directly from the person receiving support or their family. Collection of information from other agencies will only be done with consent or as authorized by law. CLASS will inform people receiving support/families, before or at the time of collecting personal information, of the purposes for which information is being collected. The only time this notification will not be provided is when an individual volunteers information for an obvious purpose (for example, producing a credit card to pay a membership fee when the information will be used only to process the payment).

CONSENT

CLASS will ask for consent to collect, use or disclose a person's personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. Consent will be assumed in cases where information is volunteered for an obvious purpose. CLASS will assume consent to continue to use and where applicable, disclose personal information that has already been collected, for the purpose for which the information was collected.

CLASS will ask for express consent for some purposes and may not be able to provide certain services if individuals are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask the person to provide their consent orally (in person, by telephone), or in writing (by signing a consent form). A person may withdraw consent to the use and disclosure of personal information at any time unless the personal information is necessary for us to fulfill legal obligations.

CLASS may collect, use or disclose a person's personal information without consent only as authorized by law; for example, in an emergency that threatens life, health or safety. CLASS will only use and disclose a person's personal information for the purpose for which the information was collected, except as authorized by law; for example, we may use someone's contact information to deliver services and supports. If CLASS wishes to use or disclose personal information for any new purpose, CLASS will ask for express consent unless consent is not required under law. For example, the law allows organizations to use personal information without consent for the purpose of collecting a debt.

PROCEDURE - EMPLOYEES, VOLUNTEERS AND BOARD OF DIRECTORS

Personal information about an employee, volunteer or Board of Director is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment or volunteer relationship. Personal employee information may include a Social Insurance Number, home address, etc. CLASS can collect, use and disclose personal employee information without consent for the purposes of establishing, managing or ending the employment or volunteer relationship. Personal employee information is collected, used and disclosed in order to meet the following purposes:

- Determining eligibility for employment or volunteer work, including verifying qualifications and references;
- Establishing training and development requirements;
- Assessing performance and managing performance issues if they arise;
- Administering pay and benefits (paid employees only);
- Processing employee work-related claims (e.g. benefits, workers' compensation, insurance claims, paid employees only);
- Complying with requirements of funding bodies (e.g. MCCSS); and
- Complying with applicable laws (e.g. Canada Income Tax Act, Employment Standards Act, etc.)

The following is a list of personal employee information that may be collected, used and disclosed to meet the above purposes:

- Contact information such as name, home address and telephone number;

- Employment or volunteer information such as resume (including educational background, work history and references), reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations and emergency contacts;
- Benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short and long term disability, etc.

(paid employees only);
- Financial information, such as pay cheque deposit information and tax-related information,

including Social Insurance Numbers (paid employees only); and
- Other personal information required for the purposes of our employment or volunteer relationship.

CLASS will inform employees, volunteers and Board of Directors of any new purpose for which personal information is to be collected, used or disclosed and consent will be requested. Consent will also be requested for purposes unrelated to the employment or volunteer relationship, such as media pictures or newsletters.

CLASS may be contacted by other organizations seeking an employment or volunteer reference. It is CLASS policy not to disclose personal information about employees or volunteers to other organizations unless written consent has been given. The personal information CLASS provides in a reference includes confirmation that an individual was an employee or volunteer, including the position and date range, general job duties and information from the most recent performance evaluation i.e. attendance, ability, etc.

CLASS will make every reasonable effort to ensure that personal information is accurate and complete. It is the individual's responsibility to notify CLASS of any changes to personal information.

CLASS will protect personal information in a manner appropriate for the sensitivity of the information. Every reasonable effort will be made to prevent any loss, misuse, disclosure or modification of personal information. CLASS will maintain security of confidential records at all times to prevent any unauthorized access and will use appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records. Personal information will be retained only as long as is reasonable to fulfill the purposes for which the information was collected or as mandated by legislation.

If a request is denied in whole or in part, people have a right to access their own personal information in a record that is in the custody or under the control of CLASS, subject to some exceptions. For example, organizations are required under the Privacy legislation to refuse to provide access to information that would reveal personal information about another individual. CLASS will provide the reasons for the refusal. In some cases where exceptions to access apply, part of the information may be withheld, and the remainder of the record provided.

Requests to access personal information, correct errors or omissions, or to learn about the use and disclosure of personal information, are to be requested in writing or by speaking to the director of human resource services or designate. CLASS will respond to requests for access within 10 business days, unless otherwise notified. Fees may be charged to provide personal information to a third party, but notification will be provided prior to the processing of the request.

QUESTIONS AND CONCERNS

If you have a question or concern about any collection, use or disclosure of personal information by CLASS, or about a request for access to your own personal information, please contact the director of human resources services or designate. A copy of this policy is provided to any individual on request.

Note: This policy appears in both the Personnel Policies and Service Delivery Policies

Internal Use – To Be Completed By Community Living Association For South Simcoe		
Current Date	Review/Amendment/Comments	Approved/Date
August 2014		Vito Facciolo August 2014