

SECTION I: ORGANIZATION

SUB-SECTION: **GENERAL**

POLICY TITLE: **Privacy and Confidentiality**

POLICY NUMBER: **I, 1.6**

PAGE NUMBER: **1 of 3**

INITIAL DATE OF BOARD APPROVAL OF POLICY: **Sept. 22, 2004**

LAST REVIEW/REVISION DATE: **May 23, 2018**

Purpose:

To protect confidential information acquired at the Centre. To clearly define the Centre's collection, use and disclosure of the personal information of its clients, employees, volunteers, students and donors as well as other individuals with whom it has contact.

Policy:

All employees, students, volunteers, Board members and consultants of the Centre shall maintain confidentiality and security with respect to confidential information and material that is acquired as a result of employment, placement or assignment with the Centre.

They shall not, without authorization, disclose any of this information or distribute materials verbally, electronically or through any other means, to any parties unless required by law.

This policy pertains to confidential information gathered and stored in any manner including but not limited to written files, documents, audio and visual files, computer files, databases and other electronically stored information and materials.

Confidentiality of the Centre's information shall continue in perpetuity following an individual's termination or departure from the Centre.

The Centre shall be accountable for all personal information in its possession.

Only necessary information shall be collected, used and stored. The purposes for which information is collected, used and stored shall be identified in advance of collection.

Information shall be collected, used and stored with permission, expressed or implied.

If the Centre intends to use personal information for a purpose not previously identified, the Centre shall obtain the individual's prior consent. The Centre may however, use or disclose personal information without consent in a life-threatening emergency or where required by law.

Permission to collect, use and disclose personal information may be withdrawn at any time.

Where a client chooses not to provide the Centre with permission to collect, use or disclose personal information, the Centre may not have sufficient information to provide services to the

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client. Where an employee or volunteer or candidate for employment chooses not to provide us with permission to collect, use or disclose personal information, the Centre may not be able to employ or place the individual or provide the employee with benefits.

Appropriate steps shall be taken to ensure that personal information in the Centre's possession is accurate and up-to-date. From time- to-time individuals may be asked to update their personal information. Individuals are responsible for advising the Centre of any changes to their personal information that may be relevant to their relationship with the Centre.

Unless prohibited by law, individuals may access their personal information to ensure that it is correct and current. If this information is inaccurate or incomplete, the necessary changes shall be made.

Personal information, including but not limited to information about donors, shall not be sold, traded or shared.

Appropriate steps shall be taken to safeguard personal information. Access to such information is restricted to employees and agents of the Centre on a "need to know" basis. All reasonable measures to protect data from loss, misuse, unauthorized access, disclosure, alteration or destruction shall be taken.

Only the domain name, not the e-mail address, of visitors to our website shall be collected.

When personal information is destroyed, the Centre shall use safeguards to prevent unauthorized parties from gaining access to personal information during the process.

Procedure:

1. Upon commencing employment, placement or assignment with the Centre, each new employee, student, volunteer or consultant will be oriented to the expectations with respect to confidentiality and the handling and security of information, documents and materials. All new employees, students, volunteers and consultants will read and sign an *Oath of Confidentiality and Privacy of Information* form.
2. The signed form will be placed in the employee's, student's, volunteer's or consultant's file.
3. The Centre will appoint a Privacy Officer to ensure compliance with this policy and any relevant legislation.

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4. The Privacy Officer will be responsible for receiving complaints and taking appropriate action.
5. All individuals involved with the Centre will report actual breaches of privacy and incidents which did not result in an actual breach (near misses) to their supervisor and to the Privacy Officer. Individuals making a privacy complaint in good faith or participating in an investigation will be free from reprisal for doing so.
6. Supervisors who receive a report of a privacy complaint, privacy breach or near miss incident will investigate the matter and take remedial action as required.
7. Individuals whose privacy has been breached will be informed of the breach; apprised of remedial actions taken; and informed if any follow up information is available.
8. The supervisor will complete a *Privacy and Confidentiality Incident Report* form to document the details of the complaint, breach or near miss incident and the actions taken.
9. The *Report* will be submitted to the Privacy Officer who will review all incidents and make any further inquiry and/or request further actions to be pursued.
10. The Privacy Officer will prepare an annual report to the Board with respect to compliance, number and nature of complaints and actions taken.

Cross References:

- I, 1.11 Record Retention
- I, 2.2 Donors' Rights
- I, 2.3 Fundraising and Clients' Rights
- III, 3.1 Confidentiality and Internal Access to Records
- III, 3.4 Security of Client Records
- IV, 4.1 Structure, Content and Security of Personnel Files
- IV, 5.1 Code of Conduct
- VII, 1.3 Information and Communication Technology Usage