



Policies and Procedures Manual

Privacy

Purpose:

Caledon Community Services (CCS) strives to ensure that the privacy of all CCS clients, staff, volunteers, program/student placements, donors and other stakeholders is respected and protected.

Policy:

CCS is committed to developing, implementing and maintaining systems and procedures in order to protect the personal information of all of its stakeholders in accordance with provincial privacy legislation. All CCS staff, volunteers, and program/student placements shall be expected to strictly adhere to CCS privacy policies and procedures. CCS privacy policies and procedures shall serve to protect the privacy of personal information belonging to the following parties:

- Clients
- Staff
- Volunteers
- Student/Program Placements
- Donors
- CCS website users

Clients:

CCS collects personal health information about the client directly from the client, or from the person acting on behalf of the client in compliance with the Personal Health Information Protection Act (PHIPA). The personal health information that CCS may collect includes:

Client's name	Date of birth	Address
Phone number	E-mail address	Health history
Records of visits and other interactions with CCS		
Emergency Contact Information		

If required, CCS collects personal health information about the client from other sources where we have obtained the client's consent to do so or where the law permits.

CCS uses and discloses clients' personal and/or personal health information to:

- Provide services for the client such as personal care giving, transportation; counseling and care coordination, employment assistance for individuals needing accommodations due to a disability, etc;
- Plan, administer and manage our internal operations;
- Conduct risk management and quality improvement activities;
- Ask clients for feedback about the services they have already received as part of our quality assurance commitment;
- Compile statistics;
- Comply with legal and regulatory requirements;
- Fulfill other purposes permitted or required by law;

Client Rights:

Under Ontario law clients have every right to:

- Know how CCS collects, uses, discloses and stores their personal health information;
- Expect that any personal health information held by CCS remains accurate, confidential and secure;
- Expect that their personal health information remains private. CCS will **not** share personal information with others without client consent unless we are permitted or required to by law;
- Look at or receive a copy of their personal health information and ask CCS to correct their personal health information record. Kindly make these requests in writing to Caledon Community Services;
- Ask questions or make a complaint to our Privacy Officer about our privacy practices;
- Withdraw their consent (if the law allows) for some of the above uses and disclosures by contacting CCS in writing;

Staff/Volunteers/Student/Program Placements:

CCS will inform its staff (or applicants for employment), volunteers, student and program placements of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

Unless the purposes for collecting personal information are obvious and the applicant, staff, volunteer, student or program placement voluntarily provides their personal information for those purposes, CCS will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection. We will only collect applicant/staff/volunteer/student/program placement information that is necessary to fulfill the following purposes:

- To assess suitability for employment or volunteer/student/program placement;
- To verify identity;
- To verify credentials;
- To check for relevant criminal records;

- To send out information;
- To meet regulatory requirements (i.e. Canada Revenue Agency (CRA) requirements) (for paid staff/program placements);
- To process payroll and/or benefits (for paid staff/program placements);
- To assess eligibility for benefits (for paid staff);
- To substantiate and/or arrange for accommodations in accordance with the Ontario Human Rights Code (OHRC);

In order for Caledon Community Services to employ (or continue to employ) staff members and to look after their well-being and to provide quality services, CCS collects and uses certain Staff Personal Information, that may include:

- Home address and telephone number;
- Date of Birth;
- Gender;
- Social Insurance Number (for Canada Revenue Agency requirements)
- Marital status;
- Photograph (for I.D. badges);
- Bank account number (for direct deposit of pay);
- Earnings
- Driving record history (abstract);
- Driver's license copy/number;
- Criminal Records Check (Vulnerable Sector);
- Functional Abilities Information (for sick leave/ STD/LTD/WSIB claims or accommodation for a disability);
- Limited information about spouses/partners/dependants for benefits or RRSP;
- Personal and professional references;
- Attendance records;
- Performance summaries and ratings;
- Career goals and objectives;

Donors:

The privacy and security of donors' personal information is important to Caledon Community Services. Caledon Community Services (CCS) respects its donors' right to privacy and is committed to protecting the personal information that donors provide to the agency.

The information collected is used:

- To facilitate donation collection and processing
- To provide tax receipts
- To communicate relevant news and updates

CCS does not trade, license, rent or sell our donors' personal information in any manner.

CCS website users:

Individuals can browse our website without disclosing their personal data. Any personal information that site visitors voluntarily choose to provide in order to complete any of our online application forms, set up a profile with our Jobs Caledon on-line job board, make donations or request information, etc IS NOT shared with third parties unless stated otherwise. CCS will ensure all personal information is secured and remains confidential.

CCS's Use of Cookies: A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer so that the website may identify separate visitors to the site and track users' activities on the website. A cookie will not let a website know any personally identifiable information about website visitors, such as their real name and address. CCS uses cookies only to keep track of how many people visited the website and how frequently each page is visited. Each individual movement of any user cannot be tracked while on CCS's site. Cookies are only used to track page popularity for statistical purposes and to improve the quality of the site and meet website user needs.

Links on our Website: CCS wants our website users' experience to be informational and resourceful; therefore our website also provides a number of links to third party sites. CCS assumes no responsibility for the information practices of sites that our users are able to access through our site. We encourage our website users to review each site's privacy policy before disclosing any personally identifiable information.

Safeguards

CCS employs a number of safeguards to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards include physical measures, for example locked filing cabinets, restricted access to offices, and limiting access on a "need to know" basis, and use of passwords and encryption.

Exceptions

Caledon Community Services does not disclose any private information regarding individuals without informed consent, unless it is required or permitted by law.

Raising Concerns or Complaints about Compliance to this Policy

If, for any reason, you are concerned about our compliance with our Privacy Policy, you may contact our Privacy Officer in writing, by mail or by email. CCS has policies and procedures to receive, investigate and respond to individuals' complaints and questions. If you are not satisfied with the way CCS has responded to a complaint, you can contact the Privacy Commissioner of Canada. This Privacy Policy may be updated from time to time and will be posted on our website.

Contact Information for the CCS' Privacy Officer:

Nancy Kopriva, Manager, Human Resources
Privacy Officer
18 King Street East, Bolton, ON L7E 1E8

E-mail: nkopriwa@ccs4u.org

References:

CCS Policies and Forms:

Complaint/Satisfaction Form

Privacy and Confidentiality Agreement

Incident Investigation Report

Personnel Records Policy – Staff and Program Placements

Personnel Records Policy – Volunteers and Student Placements

CCS Donor Bill of Rights

Privacy Complaint Investigation Procedure

Legislation:

Employment Standards Act of Ontario

PIPEDA – Personal Information and Electronic Documents Act

PHIPA – Personal Health Information Protection Act

PIPA – Personal Information Protection Act

FIPPA- Freedom of Information and Protection of Privacy Act

Health Services Operational Policies –Personal Health Information Privacy

Date Developed: February 26, 2016

Date Approved: March 2016