

OP. 41 Privacy & Information Protection Policy

PURPOSE

The Works is committed to safeguarding the personal information entrusted to us by our customers, members and employees. We manage your personal information in accordance with applicable privacy law. This policy outlines the principles and practices we follow in protecting personal information.

SCOPE

This policy applies to The Works and to any person providing services on our behalf. A copy of this policy is provided to any customer, member or employee on request.

POLICY STATEMENT

Definition of Personal Information

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, medical information etc.

Collection of Personal Information

We collect only the personal information that we need for the purposes of providing services to our customers, members, and employees including personal information needed to:

- provide requested services
- enroll a customer/member in a program
- provide employment

We normally collect personal information directly from our customers, members, and employees. We may collect your information from other persons with your consent or as authorized by law.

We inform our customers, members, and employees before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when information is volunteered 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

We ask for consent to collect, use or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose. Signage will be posted and verbal statements given to customers at information collection points.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask people to provide their consent orally (in person, by telephone), or in writing (by signing a consent form).

A client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is in the event of an emergency that threatens life, health or safety.

Use and Disclosure of Personal Information

We use and disclose personal information only for the purpose for which the information was collected, except as authorized by law.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent. We may not seek consent if the law allows this (e.g. the law allows organizations to use personal information without consent for the purpose of collecting a debt).

Definition of Personal Employee Information

Personal employee information is personal information about an employee or volunteer which is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. Personal employee information may, in some circumstances, include a Social Insurance Number, a performance review, etc.

We can collect, use and disclose your personal employee information without your consent only for the purposes of establishing, managing or ending the employment or volunteer relationship, or as authorized by law. We will provide current employees and volunteers with prior notice about what information we collect, use or disclose and our purpose for doing so.

Collection, Use and Disclosure of Employee Information

We collect, use and disclose personal employee information 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 applicable laws (e.g. Canada Income Tax Act, Labour Standards Act, etc.)

We only collect, use and disclose the amount and type of personal employee information that is reasonable to meet the above purposes. The following is a list of personal employee information that

we may collect, use and disclose to meet those purposes.

- Contact information such as your name, home address, telephone number
- Criminal background checks
- Employment or volunteer information such as your 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, emergency contacts, etc.
- 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 full time employees only)
- Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers (paid employees only)
- Other personal information required for the purposes of our employment or volunteer relationship

We will inform our employees and volunteers of any new purpose for which we will collect, use, or disclose personal employee information, or we will obtain your consent, before or at the time the information is collected.

Disclosure of Information for Employment/Volunteer References

In some cases, after your employment or volunteer relationship with us ends, we will be contacted by other organizations and asked to provide a reference for you. It is our policy not to disclose personal information about our employees and volunteers to other organizations who request references without consent. The personal information we normally provide in a reference includes:

- Confirmation that an individual was an employee or volunteer, including the position, and date range of the employment or volunteering
- General information about an individual's job duties and information about the employee or volunteer's ability to perform job duties and success in the employment or volunteer relationship

Security and Accuracy of Personal Information

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying personal information, including shredding paper records and deleting electronic records.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

Access to Personal Information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of The Works, subject to some exceptions. For example, we may refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal.

You may make a request for access to your personal information by writing to the Director/General Manager. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

Inquiries, Concerns and Complaints

If you have a question or concern about any collection, use or disclosure of personal information by The Works, or about a request for access to your own personal information, please contact the Director/General Manager.

AUTHORITY

Division Managers are responsible to the Director/General Manager for administration and adherence of this policy.

RESPONSIBILITY

All employees of The Works are responsible for enforcing this policy and reporting all violations of this policy to a Supervisor or Division Manager.

The Information Services Coordinator is responsible for ensuring the policy is accessible online and that appropriate signage communicating the policy is clearly visible.

Related Policies: Financial and Administration Policy – FA.17 Records Management