

PURPOSE:

All employees at one time or another may receive personal, privileged and/or confidential information which may concern other employees, company operations or clients/customers. The following procedures are designed to preserve the privacy of employees, clients and South Essex Community Council.

DEFINITIONS:

Cookies refer to information stored on a computer hard drive in the course of accessing information from the Internet that tracks information about the individual's browsing history and use of the Internet.

Personal Information refers to all information related to a unique individual including name and contact information, identification numbers or codes, and sensitive personal information.

PIPEDA is the *Personal Information Protection and Electronics Document Act*, the federal law governing the commercial collection, use and disclosure of personal information.

Privacy Commissioner of Canada refers to the individual who has been identified by the federal government to inform and enforce PIPEDA.

PROCEDURES

All employees will protect and respect confidential and personal information by:

- a) Taking all reasonable steps to secure and protect information as follows:
 - i) Electronic records of personal information will be subject to limited access by authorized personnel in the performance of their duties.
 - ii) Printed records of personal information, when they are not under the control of authorized personnel, will be kept in a secure location.
- b) Disclosing to individuals that personal information is being collected and directing them to the SECC Privacy Policy.
- c) Destroying the information when it is no longer required, as per funder guidelines.

Privacy Officer

The Executive Director, or his/her designate, will act as the Privacy Officer for South Essex Community Council and will be publicly available as the point of contact for all inquiries or issues related to privacy of personal information. Refer to Policy A.7.1 Personal Information Protection for a complete list of duties.

Guidelines

- a) Personal information may be collected without knowledge or consent only in the following circumstances:
 - In the event of an emergency that threatens the life, health or security of an individual
 - If there are reasonable grounds to believe that the information could be useful to investigate the contravention of a law
 - The collection is in the interest of the individual and consent cannot be obtained in a timely way
 - The collection of the information with the individual's knowledge or consent would compromise the availability or accuracy of the information and the collection is required to investigate the contravention of a law
 - The information is publicly available

- b) Personal information may be disclosed without knowledge or consent only in the following circumstances:
 - In the event of an emergency that threatens the life, health or security of an individual
 - To a lawyer representing the organization
 - To collect a debt owed to the organization by the individual
 - To a government institution that has indicated disclosure is required on a matter relating to national security or the conduct of international affairs
 - The information is publicly available
 - If required by law
 - For other circumstances listed in subsection 7 (3) of PIPEDA

- c) Requests from an individual to provide information about their personal information being collected, use or disclosed by the organization will be answered within 20 days. No fee will be charged for this service.
- d) Procedures for Employee requests to access personnel files are outlined in Article 11.04 in the Collective Agreement and in Policy A.7.1 Personal Information Protection
- e) If an individual withdraws consent for the use of personal information, the Privacy Officer will take all necessary steps to cease the organization’s use of the information within 30 days.

REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE:

- A.7.1. Personal Information Protection
- A.7.3 Clean Desk and Screen
- B.4.1 Ethics and Code of Conduct

Also see:

- SECC Confidentiality Agreement
- SECC Release of Information
- SECC Consent Form

Personal Information Protection and Electronic Documents Act (<http://laws-lois.justice.gc.ca/eng/acts/P-8.6/FullText.html>)

A Guide for Businesses and Organizations—Your Privacy Responsibilities (Office of the Privacy Commissioner of Canada, February 2012)

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ATTACHMENTS

- Attachment A—Ten Principles for the Protection of Personal Information
- Attachment B—Policy Document for Clients, Members, Stakeholders and Volunteers