

Section	GENERAL
Policy	Privacy
Approved	Date
Forms	Privacy of Personal Information Agreement Privacy Notice for Website Parental Consent Form for Publicity and Media Release Email-friendly Confidentiality and Privacy Signature Add-On

Workforce Planning Hamilton is committed to protecting the privacy of personal information that the organization collects, retains, uses, discloses and disposes of, as required by all applicable legislation including Ontario's Freedom of Information and Protection of Privacy Act (FIPPA) and Canada's Personal Information Protection and Electronics Documents Act (PIPEDA), and in accordance with the Canadian Standards Association.

The Executive Director, acting as the organization's designated Privacy Officer, is responsible for ensuring that all employees and volunteers act in accordance with this policy; for monitoring changes in Privacy legislation; for participating in privacy training as needed; and for reviewing or revising this policy where and when needed.

The Executive Director will ensure that all employees, volunteers and board members understand and sign Workforce Planning Hamilton Privacy Agreement for the Collection of Personal Information. Employees and volunteers shall receive appropriate privacy protection training.

#### **What is Personal Information?**

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- Age, name, ID numbers, income, ethnic origin, or blood type;
- Opinions, evaluations, comments, social status, or disciplinary actions; and
- Employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs).

#### **What is not Personal Information?**

Business contact information – including an employee's name, title, business address, phone number or email address – which Workforce Planning Hamilton collects, uses or discloses solely for the purpose of communicating with a person in relation to their employment, business or profession is not considered personal information.

An individual's collection, use or disclosure of personal information strictly for personal purposes (e.g. greeting card lists) is not considered personal information either.

#### **Our Commitment to Fair Information Practices**

Workforce Planning Hamilton agrees with an overriding obligation that any collection, use or disclosure of personal information must only be for purposes that a reasonable person would consider appropriate in the circumstances.

More specifically, Workforce Planning Hamilton commits itself to the 10 (ten) principles of fair information practices, which forms the ground rules for the collection, use and disclosure of personal information, as well as for providing access to personal information. These principles give individuals control over how their personal information is handled by Workforce Planning Hamilton. The ten principles are:

1. Accountability
2. Identifying Purposes
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure and Retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual Access
10. Challenging Compliance

#### **Collection of Personal Information**

With regards to collecting personal information, Workforce Planning Hamilton shall:

- Identify and document why personal information is needed and how it will be used before it's collected.
- Obtain the individual's consent in a way that is clearly understood and specify what is being collected, why it is needed, how it will be used and disclosed.
- Obtain the individual's consent before using their information for a new purpose
- Not collect personal information indiscriminately.
- Not deceive or mislead individuals about the reasons for collecting personal information.

#### **Retention and Use of Personal Information**

In regards to retaining and using personal information, Workforce Planning Hamilton shall:

- Keep personal information only as long as necessary to satisfy the purposes.
- Protect all personal information held or transferred to a third party for processing.
- Keep personal information used to make a decision about a person for a reasonable time period, allowing them to obtain the information after the decision and pursue redress, if desired.
- Minimize the possibility of using incorrect information when making a decision about the individual or when disclosing information to third parties.

- Safeguard and protect personal information, regardless of the format in which it is held, from unauthorized access, disclosure, copying, use, or modification, as well as against its loss or theft.
- Ensure that all information collected, as well as any documentation, remains the property of Workforce Planning Hamilton

#### **Disclosure of Personal Information**

In regards to disclosing personal information, Workforce Planning Hamilton shall:

- Determine if the requested record might contain personal information or third party information that affects the interests of someone other than the requester and, if so, allow the affected person to make representations about the disclosure of this information.
- Provide individuals with access to the personal information that we hold about them within 30 days of receiving the request and related fee (if any), unless access is denied in writing by Workforce Planning Hamilton for reasons permitted under legislation or as a result of extraordinary circumstances resulting in a delay.
- Individuals who have accessed their personal information have the right to seek its correction and/or in the case of a dispute, attach a statement of disagreement to the record.
- Provide recourse for complainants by directing them to the Executive Director who is responsible for investigating all complaints and taking appropriate measures to correct information handling practices and policies. If the individual remain unsatisfied, the Executive Director will inform them of their right to contact the Information and Privacy Commissioner of Ontario (IPC).
- Permit employees' access to their personnel file with 48 hours notice.
- Permit access to the personal information of a deceased employee by his/her spouse or executor or administrator of the employee's estate, if the request is made in writing and includes a copy of the death certificate.
- Ensure that employees or volunteers who wish to provide the contact information of a child that is involved in a Workforce Planning Hamilton related activity or event, acquires signed consent from a parent or legal guardian using the Parental Consent Form for Publicity and Media Release.

#### **Disposal of Personal Information**

In regards to disposing of personal information, Workforce Planning Hamilton shall:

- Irreversibly destroy, erase or render anonymous information that is no longer required for an identified purpose or a legal requirement so that it can no longer be accessed or used by anyone, including Workforce Planning Hamilton
- If contracting with a third-party for the destruction of personal information, Workforce Planning Hamilton will demand written assurance that the third-party is compliant with all relevant privacy legislation, so that from the time they take possession of the records to the time it is destroyed, individuals can be assured that personal information is

protected.

### **Informing the Public**

In regards to informing the public about our privacy policy, Workforce Planning Hamilton shall:

- Inform the public, employees and volunteers about the policies and practices for the management of personal information in an understandable way that is easily available.
- Publish its Privacy Notice on our website.
- Ensure that all employees and volunteers use the organization's Email-friendly Confidentiality and Privacy Signature Add-On.