

POLICY: Privacy

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SECTION: Human Resources

INITIAL IMPLEMENTATION DATE: July 21, 2004

LAST REVIEW: June 27, 2022

PURPOSE:

Community Living London (CLL) is committed to protecting the privacy of people receiving support, employees, volunteers, members and donors. CLL will adhere to the ten (10) principles established by the Personal Information Protection and Electronic Documents Act (PIPEDA). This Act establishes the rules governing the collection, use and disclosure of personal information in respect to commercial transactions.

POLICY:

1. **Accountability**

The Executive Human Resource Officer is responsible for all personal information under the control of the Association and compliance with this policy. All employees of CLL are accountable to the Executive Human Resource Officer for protecting the confidentiality and security of all personal information under their control.

2. **Identifying Purposes**

CLL will identify the purposes for which personal information is collected and used at the time of, or before the collection of the personal information. Personal information is collected for the following purposes:

- confirming an application for support, membership, employment or volunteering;
- assessing eligibility for Association membership;
- assessing eligibility for Association supports;
- providing support, establishing and maintaining communication and responding to inquiries;
- assessing the adequacy and quality of support provided;
- meeting legal and regulatory requirements;
- confirming employment or volunteer status and maintaining communication;
- to meet CLL's obligations as an employer, the Association will need to share personal information with other corporations in accordance with PIPEDA Regulations, for example, but not limited to, the insurance provider(s), direct deposit bank, government agencies. Social Insurance Numbers (S.I.N) are required for many of these obligations and will be shared when required;
- establishing emergency contact with family and/or others as designated by the individual;
- communicating with and providing acceptable levels of stewardship to donors.
- Use of images to educate, inform and share success of the work of CLL

3. **Consent**

CLL will explain the reason for and obtain consent before using Personal information and images for any purpose other than those listed above. CLL will only collect, use and disclose personal information with consent except where otherwise required or permitted by law. With the exception of membership mailing addresses shared with Community Living Ontario, the Association does not share, sell, trade or rent personal information. An individual may choose not to provide the Association with some or all of their personal information.

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A person may withdraw their consent to use or disclose their personal information at any time. However, it is important to remember that certain personal information is required to maintain CLL's relationship with people supported and employees. The people already receiving support or employees will grant this consent through the publication, distribution and acceptance of this privacy policy.

4. **Limited Collection**

The collection of personal information shall be limited to that personal information which is necessary for the purposes identified by the organization and shall be collected in accordance with PIPEDA Regulations.

5. **Use, Disclosure and Retention**

Personal information shall not be used or disclosed for purposes other than those purposes for which it was collected except with the consent of the individual or as prescribed by law and in accordance with PIPEDA Regulations. Personal information will only be retained for the time necessary to fulfill the purpose for which it was collected, and to meet any legal or regulatory requirements.

6. **Accuracy**

Personal information collected shall be accurate, complete and up-to-date as is necessary for the purposes for which it is to be used. People supported and employees can assist in ensuring records are current by providing CLL with changes to personal information. CLL will update such information promptly when advised of a change by a person.

7. **Safeguards**

Personal information shall be protected by security measures appropriate to the sensitivity of the information. Electronically transmitted information via public internet is not 100% secure. Therefore, CLL cannot ensure the security of any information transmitted to the Association electronically or where the Association is so requested to transmit via public internet. The Association will store both electronic and paper files to which only authorized personnel have access. The storage area will be in locked filing cabinets and computer files protected by passwords. All employees of CLL sign a Confidentiality Agreement upon commencement of employment in which they acknowledge their duties subject to this policy and subject to related legislation. Board of Directors sign a similar Confidentiality Agreement.

8. **Openness**

This policy is publicly posted and accessible via the CLL website and paper copies are available in CLL's Policy Manual and upon request to the Privacy Officer.

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9. **Individual Access**

Upon receipt of reasonable notice, people may gain access to personal information on files maintained by CLL subject to established procedures or any legal restrictions. A nominal charge may be imposed for copying of personal information.

10. **Compliance**

Any person upon whom CLL collects information, may contact the Privacy Officer with questions or suggestions with regard to CLL's compliance with this policy and relevant legislation. The Privacy Officer is the Executive Human Resource Officer and may be contacted at the Head Office of CLL. The Privacy Officer is responsible for monitoring applicable legislation and regulations and taking such steps as required to ensure that CLL's policy and related practices, procedures and safeguards remain in compliance.

Community Living London shall train and educate its employees, people supported, volunteers, and provide an orientation to new members of its Board of Directors regarding its policies and procedures respecting privacy and consent to the collection, use or disclosure of personal information.