



<b>Policy:</b> Privacy of Personal Information	<b>Review Date:</b> July 27, 2023
<b>Prepared/Revised By:</b> Human Resources	<b>Date of Issue:</b> August 31, 2015
<b>Approved By:</b> Executive Director	<b>Page:</b> 1 of 5

### **Policy Statement:**

*Milton Community Resource Centre (MCRC) is committed to respecting the privacy and confidentiality of staff, students, volunteers, donors, clients and website users, unless consent is obtained to release such information. This policy covers privacy of personal information, confidentiality of client information, donor privacy and privacy of website users.*

### **Definitions:**

- **Personal Information:** Includes recorded information about an identifiable individual. This includes any factual or subjective information in any form, which can directly or indirectly identify an individual; including but not limited to age, name, ID numbers, home address, home phone numbers, personal e-mail address, credit and bank records, donation information, income, ethnic origin, medical information etc. It does not include the name, title, designation, business address or business telephone number that identifies the individual in a business or professional capacity.

If there are any questions as to whether information is classified as “personal information” please contact Human Resources.

### **1. Privacy of Personal Information:**

In the normal course of providing services to the individuals who use them, the collection of personal information is required. In addition, MCRC must collect personal information from donors as well as staff, students and volunteers who assist us in delivering these services.

Whether governed by legislation or not, MCRC takes seriously its obligations to treat all personal information with the utmost care and to protect the privacy and confidentiality of donors, clients, website users, staff, students and volunteers.

### **Procedures:**

Personal information will only be used for the purpose for which it was collected. If there is a need to use it for other reasons the organization will obtain specific informed written consent from the individual.

- The collection of personal information will be limited to what is essential.
- All reasonable efforts will be taken to protect personal information from theft.
- All reasonable steps will be taken to protect personal information including the use of locked filing cabinets and password protection on electronic data bases.
- To protect against illegal harvesting of personal information, all necessary precautions will be taken to secure and backup personal information that is stored electronically.
- Personal information of an individual will not be provided to any donor, client, website user, staff, student or volunteer without explicit written permission of the individual whose information is being requested.

- Should an employee's Supervisor or Manager request information from that employee's staff file, they will only be given information that is relevant to their question and will not be given the staff file; rather they will be provided with the information requested from Human Resources.
- Staff, students and volunteers must not share personal information of others. Staff, students and volunteers who receive requests for another individual's personal information will direct the person requesting the information to Human Resources.
- All staff, students and volunteers will be given a copy of this policy and confirmation that they have reviewed and understood the policy will be placed in their staff/student/volunteer file.
- When requested, individuals may have access to their personal information which the organization maintains, unless access to the information would likely reveal information about a third party. The organization will respond to the request for personal information within 30 days.
- When no longer required, personal information which has been collected will be destroyed, subject to any legislative requirements.
- All forms or means used in the collection of personal information, and through the organization's website, will comply with this policy.
- It is important that all MCRC staff review and have available a copy of this policy so that they can respond to any inquiries that they may receive related to the issues contained in it.

## **2. Confidentiality of Client Information:**

Clients have the right to expect that their confidentiality will be protected and staff, students and volunteers have a duty to uphold this expectation. Client records are confidential and staff may not discuss, or request, any information to or from an external person unless the client signs appropriate disclosure forms or exchange of information forms authorizing staff to do so. Staff must not request or provide client personal information over email at any time.

### **Procedures:**

- Files containing client information should be secured when they are not actively being used. Files are to be kept in a locked cabinet when the program is closed, or in secure electronic formats.
- Confidential client information is not to be taken outside of the program.
- When files containing client information are being transported between programs or taken to satellite program locations, they should be kept in a binder secured in a backpack. If not returned to office at the end of program, they need to be kept in a secure location to minimize risk of theft.
- Staff, students and volunteers should be knowledgeable about their "duty to report" pertaining to Child Welfare and Protection.
- Staff, students and volunteers will not discuss private information in public spaces or anywhere information may be overheard.
- Staff, students and volunteers are not to agree to keep client information to themselves as a favour or condition to the information being shared.
- All information recorded about clients is to be done in a professional, non-judgemental manner with respect to client privacy. Staff members are not to add subjective notations.
- Staff, students and volunteers are not to disclose any personal information about themselves or others.

- Staff, students and volunteers have an obligation to report any violations of confidentiality to the Supervisor.

### **3. Donor Privacy**

MCRC is committed to respecting the privacy of donors.

#### **Procedures:**

- All information concerning donors or prospective donors, including their names, addresses, telephone numbers, the names of their beneficiaries, the amount of their gift etc., shall be kept strictly confidential by MCRC, unless permission is obtained from donors to release such information.
- MCRC ensures that information about their donation is handled with respect and with confidentiality to the extent provided by law.
- MCRC does not sell, rent, exchange, or otherwise share its donor list.
- When making a donation, MCRC ensures donors will receive prompt, truthful and forthright answers.
- MCRC ensures donors' requests to remain anonymous are respected and recognizes that there are circumstances when anonymity cannot apply. Any donor records that are maintained by the organization will be kept confidential to the greatest extent possible. Donors have the right to see their own donor record, and to challenge its accuracy. Please see MCRC's Donor Policy for detailed procedures on the protection of donor anonymity.

### **4. Privacy of Website Users**

MCRC collects and uses personal information for the following purposes:

- To improve customer service: User information helps us to more effectively respond to customer service requests and support needs.
- To enable online registration: User information is essential to the functionality of the programs we offer.
- To enable MCRC to effectively market programs, services and events.

MCRC adopts appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure, or destruction of personal information, username, password, transaction information and data stored on both the THRC and MCRC websites.

MCRC does not sell, trade, or rent users personal identification to others. MCRC may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with business partners, trusted affiliates and advertisers for the purposes outlined above.

Users may find advertising or other content on the MCRC and THRC sites that links to the sites and services of MCRC's partners, advertisers, sponsors and other third parties. MCRC does not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from the site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our sites, is subject to that website's own terms and policies.

MCRC may collect personal information in a variety of ways, including, but not limited to when users visit our MCRC or THRC website, fill out a form, and in connection with other services, features, or resources on MCRC's and THRC's website. Users may be asked for (for purposes of program registration): name, e-mail address, phone number, children's information etc. Users may, however, visit MCRC's and THRC's site anonymously. We will collect personal identification information from users only if they voluntarily submit such information to us. Users can refuse to supply personal information, but it may prevent them from engaging in certain site related activities (e.g. online registration, job applications and volunteer applications).

MCRC may collect non-personal identification information about users whenever they interact with MCRC's and THRC's websites. Non-personal identification information may include the browser name, the type of computer and technical information about users' means of connection to the site, such as the operating system and the internet service providers' utilized and other similar information. It is important to note that the user's identity remains anonymous.

### **The Role of the Director People and Culture Who Acts as MCRC's Privacy Officer is to:**

- Understand and promote the importance of, and compliance with this policy.
- Respond to requests for personal information.
- Be responsible for the security, integrity, safekeeping, and release of personal information.
- If an individual has concerns regarding the privacy of their personal information held by the organization, they are to be informed of the avenues of recourse. Specifically, they may file a complaint with the Director, People and Culture. Where necessary an investigation will be conducted to ensure that the individual's concern is addressed in a timely manner.
- Meet with the concerned individual and advise the individual that the concern needs to be submitted in writing and offer assistance in doing so.
- Advise the individual of the process that will follow once the written concern has been submitted.
- Inform the Executive Director that a concern has been submitted.
- Plan and conduct an investigation.
- Consult with the Office of the Privacy Commissioner of Canada when appropriate.
- Utilize the Privacy Breach Checklist if appropriate.
- Maintain appropriate documentation.
- Report findings of the investigation and make recommendations within 30 days to the Executive Director regarding resolution of the situation.
- Meet with the concerned individual to advise result of the investigation and of any action taken or to be taken in relation to it.
- All submitted concerns will be kept on file for 2 years.

### **Contact Information:**

If donors, clients, website users, staff, students or volunteers have any questions about this policy, the practices of MCRC, or the dealings with the website, please contact MCRC's Privacy Policy Officer:

**Bibi Mohammed**

Director, People and Culture (905) 876-1244 ext. 22

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