

West Neighbourhood House	
Policy Title:	Privacy
Approved by:	West Neighbourhood House Board of Directors
Approval date:	April 2007
Revision dates:	December 2011 / March 2017 / October 2020 / /

Policy Statement

West Neighbourhood House is committed to protecting the privacy and Personal Information (defined below) of its members, participants/clients, volunteers, students, employees, donors and other stakeholders. We value the trust of all of these stakeholders, and the public, and recognize that maintaining this trust requires transparent and accountable management of the information that is shared with us.

West Neighbourhood House will safeguard Personal Information and will comply with the Personal Information Protection and Electronic Documents Act (PIPEDA), the Personal Health Information Protection Act (PHIPA), Canada’s anti-spam legislation (CASL) and any other applicable legislation.

This Policy is to be read in conjunction with all other applicable West Neighbourhood House policies, including but not limited to: [Code of Conduct](#), [Confidentiality](#), and [Use of Information Technology](#).

Applicability

- General Public
- Program Participants, Members, Clients
- Volunteers
- Donors
- Students
- All Staff

Definition

Personal Information – any information that can, with reasonable foreseeability, be used to distinguish, identify or contact a specific individual (not including business contact information).

West Neighbourhood House collects Personal Information in a variety of ways and for a variety of purposes, including when providing services to individuals and conducting communications and fund development activities. The Personal Information collected may include:

- Personal name and contact details (email, address, phone, etc.), medical conditions and history, marital status and history, services provided to an individual, age, employment and income status, work history and experience, gender, race or ethnicity

The name and contact information of a business is not Personal Information.

General Principles and Procedures

West Neighbourhood House is committed to adopting, implementing, and maintaining the following principles and procedures to protect the privacy of Personal Information. West Neighbourhood House further commits to providing ongoing training for staff, volunteers and students regarding this policy and its contents.

1. Accountability

West Neighbourhood House is responsible for protecting Personal Information under its control and will have a designated a Privacy Officer to be a resource for the organization's compliance with these principles.

The Privacy Officer must be a staff member of West Neighbourhood House. The Privacy Officer will be responsible for implementing this Policy, maintaining a comprehensive and current knowledge of West Neighbourhood House operations and privacy laws, providing privacy training to staff, including communicating details of this Policy to all employees and volunteers.

All employees, volunteers (including board members), students, partner organizations or committee members who collect, process or use Personal Information must comply with this policy.

2. Rationale for Collecting Information

West Neighbourhood House will ensure that limited collection use and disclosure principles, as well as appropriate retention principles are respected in identifying why and which Personal Information is to be collected (see #4 and #5 below).

West Neighbourhood House generally uses Personal Information for purposes including:

- providing quality programs and services,
- providing information to third parties for which individuals accessing service have consented (e.g. when making a referral for service),
- responding to an individual's questions and comments,
- evaluating programs and services,
- contacting individuals about our fundraising, membership and program activities,
- responding to emergency situations (e.g. emergency contact information, program closures, etc.),
- payroll and human resources files.

3. Consent

Any person collecting Personal Information on behalf of West Neighbourhood House must obtain consent from the individual from whom Personal Information is being collected. Consent can also be provided by an authorized representative (such as a legal guardian or person having power of attorney).

There are various ways for individuals to give their consent to West Neighbourhood House to collect use and disclose Personal Information including:

- express consent – e.g. verbally, electronically or on a form individuals sign describing the intended uses and disclosures of Personal Information; and
- implied consent – e.g. when individuals provide information necessary for a service they have requested, or in some circumstances where West Neighbourhood House has given notice about its intentions with respect to individual Personal Information and individuals have not withdrawn their consent for the identified purpose (e.g. using an “opt out” option provided)

Individuals may withdraw consent for collection, use and disclosure of Personal Information at any time. If an individual withdraws their consent it is subject to contractual and legal restrictions and reasonable notice. The individual will be promptly informed of the implications of withdrawing consent.

4. Limits to Collection of Information

The collection of Personal Information is limited only to that which is necessary for the purpose identified and will be collected by fair and lawful means.

5. Limits to Use, Disclosure and Retention

Personal Information collected will not be used or disclosed for purposes other than those for which it was collected, except with consent of the individual or as required by law, and any use of Personal Information will be properly documented.

Personal Information will be destroyed, erased, or made anonymous as soon as the information is no longer relevant, or as permitted by law. All Personal Information will be deleted, erased, or made anonymous no later than seven years after the purpose for which it was collected has been completed, except as required by law.

6. Accuracy

As much as reasonably practicable and to the extent it is within the control of West Neighbourhood House, personal information collected will be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.

7. Safeguards

West Neighbourhood House management and staff will ensure that security safeguards are implemented to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Security safeguards include:

- a) Physical measures (e.g. locked filing cabinets and restricted access to offices);
- b) Organizational measures (e.g. security clearance and limiting access on a “need to know” basis); and
- c) Technological measures (e.g. the use of passwords and encryption, hardware and software firewalls, clearing temporary electronic files).

8. Openness

West Neighbourhood House will make readily available specific information about its policies and practice relating to the management of Personal Information by posting this Policy and the Privacy Officer contact information on the House website and using other appropriate communications.

9. Individual Access to Personal Information

Upon request, an individual will be informed of the existence, use, and disclosure of their Personal Information and will be given access to that information. An individual can challenge the accuracy and completeness of the information and have it amended as appropriate.

10. Monitoring Compliance

West Neighbourhood House will receive and respond to complaints about the policies and practices regarding the handling of Personal Information. The procedure for filing the complaint is outlined in the [West Neighbourhood House Complaints Policy](#).

The Privacy Officer is responsible for monitoring compliance with this policy through regular audits and checks.

11. Notification of Breach of Compliance

The Privacy Officer will ensure that any breach of compliance, as determined by the Privacy Officer, is immediately communicated to any individual(s) affected as well as the Unit Director and Executive Director who will advise the Board.

How to reach us:

West Neighbourhood House Privacy Officer Norma Frank can be reached at 416-532-4828 ext. 147 or by email at privacyofficer@westnh.org

Acknowledgement of Policy

I acknowledge that I have received and read the Privacy Policy and have had it explained to me.

I understand that it is my responsibility to abide by this policy and related policies of West Neighbourhood House as a condition of my employment/volunteer status.

Date: _____

Name of Employee/Volunteer: _____

Signature: _____