

## **Personal Information Collection, Sharing and Retention**

*The information provided here is intended to serve solely as an informational overview of privacy protection and general practices and does not necessarily reflect the specific policies and procedures in place in your local program area.*

Protecting the privacy of the personal information of any program contributors, employees, volunteers, students, suppliers and other stakeholders is a key priority. The trust of those engaged with any number of literacy programs, and the trust of the public is of importance to the successful implementation of any program. Maintaining this trust requires transparency and accountability in how information that is shared is treated.

During the course of day-to-day activities, special events and other activities, personal information is frequently gathered and used. If such information is collected, individuals should expect that it will be carefully protected and that any use of or other dealing with this information is subject to written consent from the individual it was gathered from.

### Defining Personal Information

Personal information is any information that is legitimately collected that can — either directly or indirectly — distinguish, identify or be used to contact a specific individual. An employer or service provider who legitimately requires and collects personal information that either directly or indirectly identifies an individual by one of the prohibited grounds of discrimination listed in the provincial human rights code or the federal human rights act, must ensure the maximum degree of confidentiality of the information. Some examples may include information about:

- Religious belief
- Citizenship
- Sexual orientation
- Same-sex partnership status
- Disability and/or perceived disability or other health-related information
- Record of offences
- Age
- Source of income

**Note:** This is a sample listing. As the prohibited grounds differ across the country, it is important to access the code that is specific to your province or territory. Please refer to the following website for further information on human rights and human resources in the voluntary sector.

<http://www.hrcouncil.ca/laws/pg002be.cfm#cat13>

The Canadian Human Rights Act can be accessed at:

[http://www.chrc-ccdp.ca/discrimination/federally\\_regulated-en.asp](http://www.chrc-ccdp.ca/discrimination/federally_regulated-en.asp)

Exceptions that are not considered as personal information include business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories. Where an individual uses his or her home contact information as business contact information, it is considered that the contact information provided is business contact information and is, therefore, not subject to protection as personal information unless otherwise stated/requested.

### Privacy Practices

Any personal information gathered must be kept in confidence. Staff or volunteers are authorized to access such personal information based only on their need to deal with the information for the reason(s) for which it was obtained. The information must not be disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. All measures must also be taken to ensure that the integrity of this information is maintained and to prevent its being lost or destroyed.

Collection, use and disclosure of personal information is only for purposes that are appropriate in light of the circumstances. Individuals are always offered the opportunity to opt not to have their personal information shared with staff or volunteers and third parties for purposes beyond those for which it was collected.

#### *Collecting personal information:*

Staff or the volunteer may collect personal information for the primary purpose of conducting day-to-day operations such as, training, tutoring, special events and other activities. The local program will explain why the information is being gathered and may collect details including for example; name, address, telephone and fax number and email address if applicable. In addition, specific information that will facilitate the student and tutor matching process will also be collected.

For an individual under the legal age of consent, consent of the individual's parent or legal guardian to the collection of information about that person is required.

#### *Securing personal information:*

To prevent any unauthorized access to personal information, the local program will ensure that only staff or other authorized individuals have access to personal information. Hard copies of any such information are stored in locked filing cabinets, offices and equivalent off-site secured storage areas.

*Withdrawing consent:*

If an individual does not consent to all of the disclosures set out above, the individual can inform the local program that they do not wish to have any portions of or all personal information used or disclosed. If the local program does not receive any objection to the uses or disclosures as stated above, it will assume that it has express consent to all such uses and disclosures.

*Accessing personal information:*

Upon written request, an individual may access the personal information at any time.

*Changing personal information:*

The local program endeavors to ensure that personal information held by it is accurate, complete and up-to-date.

Where an individual believes that personal information is not accurate, complete or up-to-date, every effort will be made to correct the information.

*Lodging a complaint:*

For any purpose associated with privacy matters including the lodging of a complaint, please contact the local program.

**Source:** *Adapted from Junior Achievement of Newfoundland and Labrador privacy policy and Human Rights at Work, a co-publication between the Human Resources Professional Association of Ontario and the Ontario Human Rights Commission.*