

PRIVACY TIP SHEET

Reviewing the Ministry's "Notice of Collection" with Clients

You will find the "Notice of Collection" in the client Applications. You are required to understand the Ministry's "Notice of Collection" in order to ensure that you can explain the details with your clients.

The 4 key points to always cover are:

1. **Why their personal information is being collected and how it will be used**
2. **From whom the Ministry may collect information and with whom the Ministry may share information**
3. **What laws & regulations allow the Ministry to collect the information**
4. **Whom to contact with questions and concerns**

Explaining the Consent to the Ministry's "Collection, Use and Disclosure of Personal Information" to Clients

When your clients sign, they are giving the Ministry permission to use their information and to:

- **collect information about them from 3rd parties**
(e.g., data we the service provider enter into the EOIS system about you the client)
- **share information about them with 3rd parties**
(e.g., reporting to Canada, placement with employers, etc.)



Explaining the Acknowledgement of Your Organization's "Collection, Use and Disclosure of Personal Information" to Clients

When your clients sign, they are acknowledging that you have explained how your organization will use and/or disclose their personal information to deliver [insert program name].

Your Organization's Privacy Obligations: At a Glance

Your organization must:

1. Develop and implement a privacy policy which is made publicly available (posted in your office where clients can read it, available on your website, etc.).
2. Designate an experienced official in your office to be responsible for ensuring compliance with your organization's privacy policy and the privacy provisions outlined in the agreement with the Ministry.
3. Continuously update staff and subcontractors who have access to clients' personal information with the appropriate training and resources.
4. Rigorously follow the procedures set in your privacy policy and the Ministry agreement for the collection, storage, use, and disclosure of personal information as well the destruction of records when no longer needed for program delivery or to comply with agreement provisions.
5. Provide clients with access to their personal information upon their request.
6. Immediately notify the Ministry of a potential or actual privacy breach and fully cooperate in any audit or investigation of any privacy breach.
7. Be aware, and make your staff and clients aware, that when a client signs an EO contract, they are agreeing to:
 - the ministry's collection, use, disclosure of their personal information.
8. Ensure that only authorized users access the Ministry's Case Management System.

The Ministry is bound by *Freedom of Information & Protection of Privacy Act (FIPPA)*. Your obligation under the agreement with the Ministry is to ensure that the Ministry is not in breach of *FIPPA*.

You Will Find Your Organization's Privacy Obligations in:

- The agreement signed by your organization and the Ministry and your organization's privacy policy.
- *Personal Information Protection and Electronic Documents Act (PIPEDA)* - a law that governs private sector organizations involved in commercial activities.
- *Canadian Standards Association's (CSA) Model Code for the Protection of Personal Information* - general privacy standards.



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Tips to Safeguard Clients' Personal Information

- Hardcopy documents containing clients' personal information must be stored in locked filing cabinets.
- Follow a clean desk policy.
- Use *Ctrl-Alt-Del* and press *Enter* to lock your computer every time you leave your workstation.
- Update clients' personal information through a face-to-face meeting or a signed mail-in request.
- Do not send or leave personal information in an email or voicemail.
- Do not store clients' personal information on portable memory sticks (USBs), laptops, your computer desktop or Blackberries.
- If you must take client paper files off site (e.g., resumes for potential employers), be vigilant in protecting them.
- Be aware of your surroundings when discussing clients' personal information. Limit what you say (talk softly!).



FAQs (Asked by Clients)

Q: What is your organization doing to ensure my personal information is protected?

A: Our organization is serious about protecting our clients personal information.

- You can view our organization's Privacy Policy at *[insert locations where you have posted your organization's Privacy Policy, for example online or onsite]*.
- We have a designated Privacy Officer *[insert name]* who is responsible for ensuring compliance with our organization's Privacy Policy and the privacy provisions outlined in our agreement with MTCU.
- All staff and sub-contractors have acknowledged prior to gaining access to the system that they are responsible for protecting clients personal information.
- All staff and sub-contractors have received privacy training.

Q: Why do you need to collect my Social Insurance Number (SIN)?

(Please note, this question may not be applicable to your organization as SIN is not asked for all programs.)

A: The services you are going to receive are funded in part by Canada, and as such, MTCU is required to collect your SIN to report back to Canada.

Q: How do I go about reviewing the personal information that your organization has on file about me?

A: Contact us and we can arrange an appointment to show you the information.

Q: I am not satisfied with how my personal information is being handled. Whom do I contact about this?

A: You can start by contacting our organization's Privacy Officer *[insert name and contact information]*. If the Privacy Officer is unable to resolve the issue to your satisfaction, you can call, the Manager of the Employment Ontario Hotline at 1-800-387-5656 to discuss the matter.

Q: What is your organization going to do with my personal information? How will it be used?

A: *[Insert response]*

Q: Why do I have to sign the Notice of Collection and Consent twice?

A: In the first signature, you are consenting to the Ministry's use and disclosure of your information. In the second signature, you are acknowledging that we have explained how we are going to use and/or disclose your information to deliver *[insert*

Privacy Resources

- PIPEDA: www.priv.gc.ca
- CSA's *Model Code for the Protection of Personal Information*: www.csa.ca/cm/privacy-code
- FIPPA: www.ipc.on.ca
- Office of the Chief Information and Privacy Officer (MGS): www.accessandprivacy.gov.on.ca/

You can access clients' personal information for the sole purpose of delivering EO services.

If you look up a client for any other reason, you may be committing a

Privacy Breach!

