

**Communications
AGO 204
Privacy Policy**

Authority: Executive Director

PRIVACY POLICY (AGO204):

The Agency believes in maintaining high standards of ethical conduct in the operation of the Agency's programs and the representation of them to the community, including a commitment to privacy and confidentiality within the limitations defined by law. The Agency adheres to all applicable Federal and Provincial Privacy legislation and is committed to protecting the professional and personal privacy and confidentiality of its employees, volunteers, clients and contractual relationships.

GUIDELINES:

- The nature of the matters normally brought to the attention of the Agency may involve the most personal and intimate aspects of the Agency's employees, clients and volunteers lives. Individuals share the information with the expectation that it will be kept confidential and will not be subject to abuse.
- Individuals in a position of trust within the Agency will treat as confidential, all information acquired in the course of their work or volunteer activities as the case may be, concerning members, clients, participants, volunteers, staff, donors, and other constituents. When such information is revealed for professional purpose, it is done with discretion and respect for the persons concerned. Examples of confidential material include, but are not limited to, the following:
 - a) All client records and information
 - b) All Employee and volunteer records and information
 - c) All home addresses and phone numbers of clients, volunteers, donors, partners and employees
 - d) All Board business including:
 - Financial/fund raising information
 - Personnel business
 - Proposals pending
- The Agency is governed by any and all applicable federal/provincial or parent legislation and disclosures are only made when necessary to comply with legal requirements. Applicable Federal and Provincial Legislation includes but is not limited to:
 - Canada's Anti-Spam Legislation
 - FOIP (Freedom of Information and Protection of Policy)
 - PIPEDA (Personal Information Protection and Electronic Documentation Act)
- For more detailed guidelines and procedures related to client and volunteer service delivery files (and database records) please see Policy SD701 in the Agency Service Delivery Policy and Procedure Manual.

PROCEDURE:

1. All individuals in a position of trust within the Agency are required to complete a privacy/confidentiality agreement and abide by the following on projects and related working documents that may be designated confidential:
 - a. Individuals with access to such information or documents must adhere to the strictest rules of confidentiality.
 - b. Third party accessing of confidential information can only occur when the individual to whom it pertains to provides the Agency with written permission to allow third parties to access the personal information
 - c. Individuals requesting personal contact information for any client, volunteer, donor, funder or employer will be told the Agency's policy; and the caller's name and number will be recorded and provided to the client, volunteer, donor, funder or employer to return the call if they so desire
2. All requests for personal information from financial institutions relating to employment matters are to be directed to the Executive Director or to the Manager of Finance.
 - a. Employees may sign a release form to permit information being released from the Manager of Finance to financial institutions for confirmation of employment status and salary.
3. The Agency is governed by any and all applicable federal/provincial or parent legislation and disclosures are only made when necessary to comply with legal requirements.
4. The Agency will identify the purpose for which we collect personal information at or before we collect it. Most often information sent to families, volunteers, employees, donors and partners is for one or more of the following purposes:
 - A. To provide information regarding Agency news and events
 - B. To process Agency event registrations or Agency donations
 - C. To meet legal and regulatory requirements.
5. The Agency will obtain each individual's consent before collecting or using any personal information. Individuals have the right to unsubscribe at any time.
6. The Agency has guidelines in place (Marketing and Communications) regarding the use of Commercial Electronic Messages in order to comply with Canada's Anti-Spam Legislation. No commercial electronic messages are to be sent to any person or organization that has not given consent, unless the commercial electronic message has as its primary purpose raising funds for the Agency, or raising funds for another registered charity and the message is on behalf of that registered charity
7. A breach of privacy or confidentiality will result in discipline up to and including termination.
8. The Executive Director is named as the Agency's Chief Privacy Officer.