

<b>KAWARTHA CHILD CARE SERVICES</b>		<b>SECTION:</b> Corporate
<b>Draft Date:</b> May 25/07 <b>Approved Date:</b> Oct 29/07	<b>Policy:</b> Privacy Policy <b>Policy Number:</b> 1.220	<b>Corresponding Forms:</b> Client Consent, Privacy Statement, Staff Provider Consent, Release of Information

## Policy

Kawartha Child Care Services is committed to maintaining the accuracy, confidentiality, security and privacy of clients, employees, providers and volunteers. This policy has been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act (PIPEDA)*. PIPEDA sets out rules for the collection, use and disclosure of personal information in the course of commercial activity as defined in the Act. This policy applies to Kawartha Child Care Services Board of Directors, members, employees, providers and volunteers.

## Definitions

*"Personal Information"* includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form such as age, name, ID numbers, income, ethnic origin or blood type, opinions evaluations, comments, social status or disciplinary actions, employees files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant intentions (for example to acquire goods and services or change jobs).

*"Express Consent"* means the individual signs the consent or other forms containing personal information, authorizing KCCS to collect, use and disclose the individual's personal information for the purposes set out in the application and/or forms.

*"Implied Consent"* means the organization may assume that the individual consents to the information being used, retained and disclosed for the original purpose, unless notified by the individual.

*"Third Party"* means a person or company that provides services to KCCS in support of the programs, benefits and other services offered by KCCS.

## Procedure

1. Kawartha Child Care Services will only collect personal information from clients in order to provide child care services and from employees, provider and volunteers in order to be employed, contracted or to volunteer.
2. Kawartha Child Care Services will only use personal information for the purpose stated at the time of collection and will only supply it without consent where;
  - the organization is required by law
  - an emergency exists that threatens an individual's life, health or security
  - the information is for statistical study or research
  - the information is publicly available

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- the use is clearly in the individuals interest and consent is not available in a timely way
- knowledge and consent would compromise the availability or accuracy of the information
- collection is required to investigate a breach of an agreement

3. Personal information will only be disclosed without consent to;
  - a lawyer representing Kawartha Child Care Services
  - comply with a subpoena, a warrant or an order made by court or other body with appropriate jurisdiction
  - a law enforcement agency in the process of a civil or criminal investigation
  - a government agency or department requesting the information as required by law.
  
4. Active files are stored in locked filing cabinets. Only those Kawartha Child Care Services employees, volunteers or third parties who need to know this information for the purpose of their work will have access to it.
  
5. Personal information contained in Kawartha Child Care Services computers and electronic databases will be password protected. Personal information will not be transferred to volunteer committee members, the Board of Directors or third parties by email or other electronic form.
  
6. Individuals may request access to their information by contacting the Chief Privacy Officer in writing. Any complaints should also be forwarded to the Chief Privacy Officer.