

Privacy Protection

Authority

The Board of Directors of The Special Needs Employment Service Inc. approved this Guide Memo.

Applicability

The Policies and Procedures of this section apply to Employee's/Company Representatives and clients of The Special Needs Employment Service Inc.

Summary

The Policies and Procedures set forth in this Guide Memo have been developed to comply with The [Personal Information Protection and Electronic Documents Act](#) ("PIPEDA", or "PIPED" Act) which was first introduced into the Canadian House of Commons in October 1998 as Bill C-54 and re-introduced as Bill C-6 in October 1999 at the opening of the new Parliamentary session. The Senate passed the bill with two amendments pertaining to personal health information and Parliament approved the amendments and the Act received Royal Assent on April 13, 2000. Any organization operating in Canada *must* comply with this act or, if it exists, the provincial equivalent (such as [FIPPA](#) in Ontario) and to facilitate the privacy of Employee's/Company Representatives and clients of The Special Needs Employment Service Inc. while at the same time, promoting the safety of the organization

Section One

STATEMENT OF POLICY

The collection, use and handling of Employee/Company Representative and client information for the purposes of this Policy are for service and safety purposes of SNES Inc. In providing services, SNES Inc. gives utmost priority to the maintenance of privacy and strives to protect the confidentiality of any personal information that is given to SNES Inc. At the same time, SNES Inc. must also reveal any information, which could reduce the safety of Employees/Company Representatives/clients of SNES Inc. and/or the organization as a whole.

DEFINITION

For the purposes of this Policy, Section 2(1) of the Freedom of Information and Protection of Privacy Act defines “personal information” as recorded information about an identifiable individual, including:

- a. Information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual;
- b. Information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;
- c. Any identifying number, symbol or other particular assigned to the individual;
- d. The address, email address and telephone number of the individual; and
- e. The individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

CONFIDENTIALITY

SNES Inc. recognizes the difficult and sensitive decision of maintaining confidentiality. To protect confidentiality, while at the same time protecting the safety of SNES Inc., information sharing will be restricted to authorized and appropriate access. For safety purposes, Employee’s/Company Representatives sharing client information includes, but is not limited to, red flagging of potential problem clients and identification of past incidents that could be detrimental to the safety of SNES Inc. For service purposes, any information authorized by Employees/Company Representatives/clients to be shared will be used when needed, to fulfill employment needs or provide optimal service for clients.

TYPES OF PERSONAL INFORMATION COLLECTED

SNES Inc. may collect personal information through electronic means, by phone, by mail or in person. Personal information includes, but is not limited to:

- a. Name, home address, home telephone

- b. E-mail address
- c. Emergency contact information
- d. Place of employment and job title
- e. Employment history and educational achievements
- f. Paid Employee banking information for income purposes
- g. Paid Employee information for tax purposes
- h. Social Insurance Number
- i. Documentation as a requisite of paid training initiatives
- j. Driver's License and proof of valid car insurance

PURPOSE OF COLLECTING & USE OF PERSONAL INFORMATION

For both Employees/Company Representatives and clients, personal information may be collect and used for notification of upcoming meetings, events, programs, etc.

In order for SNES Inc. to provide service for clients, personal information is required. The nature and use of the personal information will be outlined upon collection. All clients must read and sign an acknowledgement and consent form which will be kept in the client file. Information may be used for several purposes, including but not limited to, efficient administration, creation and maintenance of client lists and referrals to outside agencies (as agreed to by client in writing). For safety purposes, client information can be shared without consent, as identified in policy statement 1.1.

Wherever possible, personal information will be collected in person at the start of service/employment. Additional information may be collected by SNES Inc. to address additional service/employment needs. DISCLOSURE OF PERSONAL INFORMATION

SNES Inc. may disclose personal information in circumstances such as, but not limited to:

- a. When required or authorized by law to do so;

- b. If referring a client to a third party (as agreed to by client in writing);
- c. If deemed necessary for the safety of Employees/Company Representatives/clients of SNES Inc. and/or the organization as a whole;
- d. In the event that a client of SNES Inc. wishes to view/photocopy their personal file, the client must fill out a Disclosure of Personal Information Form (an administration fee may apply); and
- e. When required or authorized by contractual agreement.

NOTE: In all situations, SNES Inc. will only disclose as much personal information as is required by the circumstances. Unless authorized by clients or required by law, SNES Inc. will not sell, lease or trade any personal information to third parties.

UPDATING/CORRECTING INFORMATION

In order to provide efficient employment/service, it is important that personal information is accurate and up-to-date. If any personal information changes occur during the course of service or employment, and/or service provision please inform the appropriate SNES Inc. personnel, so changes can be made. Members of the Board of Directors and Senior Staff, should contact the Accounts Administrator; staff members should contact your immediate supervisor. If up-to-date information has not been provided, SNES Inc. may take reasonable steps in contacting the Employee/Company Representative/client or third party to gather the correct information.

PROCESS FOR DESTRUCTION OF PERSONAL INFORMATION

- a. For tax purposes, Employees'/Company Representatives' personal information must be kept on file for 7 years following termination of employment;
- b. Following the duration of the 7 year term, any Employees'/Company Representative's paper-based personal information will be shredded, then disposed of;
- c. In order for SNES Inc. to provide updates and continual service, paper-based personal client information will be held for a maximum of 7 years;
- d. Electronic-based personal client information may be kept indefinitely.

PRIVACY PROTECTION PROCEDURES OF PERSONAL INFORMATION

SNES Inc. policy shall meet or exceed current government legislation and that in areas not covered or unclear by this policy; present government legislation shall supersede this policy. SNES Inc, will take all reasonable precautions to ensure personal information is kept safe.

Steps to be taken to protect the information include, but are not limited to:

- a. Employee training in the storage, safeguarding and use of personal information;
- b. Restricted file access to personal information (files are to be locked up and secured in a filing cabinet);
- c. In the event that a file is reviewed by an Employee/Company Representative, the file will subsequently be returned to the cabinet and the cabinet will be re-locked;
- d. Technological safeguards such as password protection will be used to prevent unauthorized computer access;
- e. Referrals/contracts with third parties bind together both the Privacy Policy of SNES Inc. and the third party.

Section Two

WebTracker Policy

Authority

The Board of Directors of The Special Needs Employment Service Inc. approved this Guide Memo.

Applicability

The Policies and Procedures of this section apply to Employees/Company Representatives and clients of The Special Needs Employment Service Inc.

Summary

The Policies and Procedures set forth in this Guide Memo have been developed to facilitate the privacy of clients of The Special Needs Employment Service Inc. while promoting the safety of the organization at the same time.

STATEMENT OF POLICY

The collection, use and handling of client information on WebTracker for the purpose of this Policy are for service and safety purposes of SNES Inc. In providing services, SNES Inc. gives utmost priority to the maintenance of privacy and strives to protect the confidentiality of any personal information that is given to SNES Inc. At the same time, SNES Inc. must also reveal any information, which could reduce the safety of Employees/Company Representatives/clients of SNES Inc. and/or the organization as a whole.

DEFINITION

For the purposes of this Policy, Section 2(1) of the Freedom of Information and Protection of Privacy Act defines "personal information" as recorded information about an identifiable individual, including:

- a. Information relating to the race, national or ethnic origin, colour, religion, age, gender, sexual orientation or marital or family status of the individual;
- b. Information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual;
- c. Any identifying number, symbol or other particular assigned to the individual;
- d. The address, telephone number of the individual;
- e. The individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual;
- f. Social Insurance Number;
- g. Documentation as a requisite of paid training initiatives.

CONFIDENTIALITY

SNES Inc. recognizes the difficult and sensitive decision of maintaining confidentiality. To protect confidentiality, while at the same time protecting the safety of SNES Inc., information sharing will be restricted to authorized and appropriate access. For safety purposes, Employee's/Company Representatives sharing of client information includes, but is not limited to identification of past incidents that could be detrimental to the safety of SNES Inc. For service purposes, any information authorized by the client, staff member and WebTracker Administrators to be shared will be used when needed, to fulfill employment needs or provide optimal service for clients.

EMPLOYEE ACCESS

For business delivery needs, all Employees must be granted permission by the designated Web Tracker Administrator to access WebTracker. Upon completion of a three-month trial period, full-time Employees will be provided with a permanent password for the database. The password is to be kept confidential. The Administrator will remove access for full-time Employees upon the last day of employment.

HOURS OF ACCESS

For safety purposes, access will be limited to daily hours of work for the organization. Unless granted permission for specified reasons by the designated WebTracker Administrator. Employees should not access WebTracker at any other time.

TYPES OF PERSONAL INFORMATION COLLECTED

SNES Inc. may collect personal information through electronic means, by phone, by mail or in person. Personal information includes, but is not limited to:

- a. Tombstone Information
- b. Employment Counselling Information
- c. Follow-Up Information

PURPOSE OF COLLECTING & USE OF PERSONAL INFORMATION

In order for SNES Inc. to provide service for clients, personal information is required. The nature and use of the personal information will be outlined upon collection, if requested by the client. Information may be used for several

purposes, including but not limited to: efficient administration, creation and maintenance of client lists, Case File Management, Action Plans, Intervention Programs and referrals to outside agencies (as agreed to by client in writing).

For both Employees/Company Representatives and clients, personal information may also be used for notification of upcoming meetings, events, programs, etc.

Wherever possible, personal information will be collected in person at the start of service. Additional information may be collected by SNES Inc. to address additional service needs.

DISCLOSURE OF PERSONAL INFORMATION

SNES Inc. may disclose personal information in circumstances such as, but not limited to:

- a. When required or authorized by law to do so;
- b. If referring a client to a third party (as agreed to by client in writing);
- c. If deemed necessary for the safety of Employees/Company Representatives/clients of SNES Inc. and/or the organization as a whole;
- d. In the event that a client of SNES Inc. wishes to view/photocopy contents of their electronic file, the client must fill out a Disclosure of Personal Information Form. Upon completion of the Form, the Administrator must print out the requested information. Under no circumstance may a client access/view the contents of their WebTracker file electronically (an administration fee may apply).

NOTE: In all situations, SNES Inc. will only disclose as much personal information as is required by the circumstances. Unless authorized by clients or required by law, SNES Inc. will not sell, lease or trade any personal information to third parties.

UPDATING/CORRECTING INFORMATION

In order to provide service, it is important that personal information is accurate and up-to-date. If up-to-date information has not been provided, SNES Inc. may take reasonable steps in contacting the client or third party to gather the correct information.

REQUESTING DATABASE SYSTEM CHANGE

Request for changes by Administrators to the WebTracker system require both SNES Inc.'s designated Web Tracker Administrator and Digital Ideas WebTracker Administrators agreement and signatures as provided on Request for WebTracker System Change Form.

PROCESS FOR DESTRUCTION OF PERSONAL INFORMATION

Electronic-based personal client information may be kept indefinitely.

PRIVACY PROTECTION PROCEDURES OF PERSONAL INFORMATION

SNES Inc. will take all reasonable precautions to ensure personal information is kept safe. Steps to be taken to protect the information include, but are not limited to:

- a. Employee training in the safeguarding and use of WebTracker;
- b. Technological safeguards such as password protection to prevent unauthorized WebTracker access;
- c. Restricted access to passwords (password is to be secured with access limited to Administrators);
- d. Referrals/contracts with third parties bind together both the Privacy Policy of SNES Inc. and the third party.

Supplementary Policy

The following policy has been provided for the Ministry of Labour, Training and Skills Development (Ministry) to Ministry funded programs, for the purpose of collecting, maintaining and reporting of client and program activity within the parameters of and throughout the terms of, the agreement with the Ministry.

This document makes up part of the Personal Information Form that clients receiving assisted services must complete. The Ministry document also includes space for a client signature. The following document is given to clients for their own records.

INFORMATION FOR CLIENTS

ABOUT REQUESTED PERSONAL INFORMATION

(Please keep for your records)

Your service Provider delivers the Ontario Employment Assistance Services under an agreement with the Ministry of Labour, Training and Skills Development and is required to make its books and records available to the Ministry for inspection, investigation or audit. Your Service Provider is also required to report to the Ministry on:

- The service it tailors and provides to you
- Your educational, training and employment progress and outcomes
- Your satisfaction with the service you receive

The Ministry will also collect relevant personal information from Canada if necessary to determine your eligibility for the nature and level of Employment Insurance benefits and to monitor, assess and evaluate the effectiveness of the Ontario Employment Assistance Services. Depending on the type of service or support you receive, the Ministry may also collect personal information indirectly from your employer.

The Ministry will use your personal information to administer and finance the Ontario Employment Assistance Services. For purposes of administering the Ontario Employment Assistance Services, client information collected on this form will be recorded, either by the Service Provider or Ministry. Note: The Ministry may use contractors and auditors to administer and finance the Ontario Employment Assistance Services.

Administration includes:

- Assessing the performance of your Service Provider – its effectiveness, efficiency and customer service results; monitoring, inspecting, investigating, auditing and enforcing your Service Provider’s compliance with its agreement with the Ministry;
- Planning, evaluating and monitoring the Ontario Employment Assistance Services – this includes conducting surveys; and conducting policy and statistical analysis and research related to all aspects of Ontario Employment

Assistance Services. You may be contacted to request your voluntary participation in surveys; and

- Promoting the Ontario Employment Assistance Services – You may be contacted to request your voluntary participation in public relations campaigns related to Ontario Employment Assistance Services.

The Ontario Employment Assistance Services are funded by the Ministry, in part with funds provided by Canada under Part II of the *Employment Insurance Act*. Under the Labour Market Development Agreement (LMDA) between Canada and Ontario, the Ministry is required to collect your social insurance number to provide reports to Canada to allow it to monitor and assess the Employment Insurance Program as required under s.3 of the of the *Employment Insurance Act*. For example such a report, see:

The Ministry collects your personal information in accordance with s.38(2) of the *Freedom of Information and Protection of Privacy Act*, R.S.O. 1990.C.F.31, as amended, the LMDA, the labour Market Agreement between Canada and Ontario, ss.3, 63 and 139 of the *Employment Insurance Act*, S.C. 1996, C.23, as amended, s.76.29 of the *Employment Insurance Regulations*, SOR/96-332, ss.10, 34(1) and 36(1) of the *Department of Human Resources and Skills Development Act*, S.C.2005, C.34 and S.8 of the *Privacy Act*, R.S. 1985, c. P-21, as amended.

For more information about the collection and use of your personal information to administer and finance the Ontario Employment Assistance Services you can contact the Manager, Employment Ontario Hotline, in writing at the Ministry of Labour, Training and Skills Development, 33 Bloor Street East, 2nd Floor, Toronto, ON M4W 3H1 or by phone at 1-800-387-5656.

Section Three

Website and On-line Interactions

This section of the privacy policy complies with the requirements of the *Personal Information Protection and Electronic Documents Act of Canada* (PIPEDA) which has established rules for the protection of an individual's personal information when it is collected, used and disclosed for the purpose of business. The WorkPlace Group treats your privacy very seriously. The following statement explains our policy regarding the personal information we collect about you:

1. Statement of intent - From time to time, you will be asked to submit personal information about yourself (e.g. name and email address, etc.) in order to receive or use services on our website. Such services include newsletters or further information about our service. By entering your details in the fields requested, you enable The WorkPlace Group and its service providers to provide you with the services you select. Whenever you provide such personal information, we will treat that information in accordance with this policy. Our services are designed to give you the information that you want to receive. The WorkPlace Group will act in accordance with current legislation and aim to meet current Internet best practice.

2. Information on visitors - During the course of any visit to The WorkPlace Group, the pages you see, along with something called a cookie, may be downloaded to your computer (see point 3 for more on this). Most, if not all, websites do this because cookies are generally used to make it more convenient for users to move around websites. If you choose, they may be used to “remember” your password and make it easier and faster to log-in to certain sites. These types of cookies need to be stored on your computer’s hard drive. Cookies also allow the website publisher to do useful things like find out whether the computer (and probably its user) has visited the site before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

Any information that is supplied by cookies can help us to provide you with a better service and assists us to analyze the profile of our visitors. For example, if on a previous visit you went to, say, the 'about us' pages, then we might find this out from your cookie and highlight educational information on a second visit.

Both the cookies and the embedded code provide non-personal statistical information about visits to pages on the site, the duration of individual page view, paths taken by visitors through the site, data on visitors' screen settings and other general information. The WorkPlace Group uses this type of information, as with that obtained from other cookies used on the site, to help it improve the services to its users.

3. What is a cookie? - When you enter a site your computer will automatically be issued with a cookie. Cookies are text files that identify your computer to our server. Cookies in themselves do not identify the individual user, just the computer used. Many sites do this whenever a user visits their site in order to track traffic flows.

Cookies themselves only record those areas of the site that have been visited by the computer in question, and for how long. Users have the opportunity to set

their computers to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. NB: Even if you have set your computer to reject cookies you can still browse our site anonymously.

4. Use and storage of your personal information - When you supply any personal information to The WorkPlace Group (e.g. to receive further information) we have legal obligations towards you in the way we deal with that data. We must collect the information fairly, that is, we must explain how we will use it (see the notices on particular web pages that let you know why we are requesting the information) and tell you if we want to pass the information on to anyone else. In general, any information you provide to The WorkPlace Group will only be used within the context of The WorkPlace Group and its employees. It will never be supplied to anyone outside The WorkPlace Group without first obtaining your consent, unless we are obliged by law to disclose it.

The WorkPlace welcomes your comments and questions about this Privacy Statement. Please address comments or questions regarding The WorkPlace Group Privacy Statement by email to info@theworkplacegroup.ca. We reserve the right to change this Privacy Statement from time to time. Please check this Privacy Statement periodically for changes.

Complaints Procedure – Customer concerns are taken seriously

If you have a complaint regarding any of the above, you are encouraged to report it directly to the Executive Director, Noeleen Tyczynski at 519-337-7377 ext. 23 or through email at Noeleen.Tyczynski@theworkplacegroup.ca. In the event the Executive Director is unavailable, you are encouraged to contact the Resource Manager, Gail Majovsky at 519-337-7377 ext. 24 or through email at Gail.Majovsky@theworkplacegroup.ca. For information of the complete complaint procedure, please contact the office directly and request a copy of our Customer Service Charter.

NOTE: In all situations, SNES Inc. will only disclose as much personal information as is required by the circumstances. Unless authorized by clients or required by law, SNES Inc. will not sell, lease or trade any personal information to third parties.