



## Sistering – Woman’s Place Privacy Policy

### INTRODUCTION

Sistering – A Woman’s Place maintains the privacy of personal information we receive in the course of day to day operations from our various stakeholders. Personal information includes name, gender, address, race, ethnicity, identification, documents, etc.

While this document outlines the broad Sistering’s Guidelines on privacy, each area of our operations has procedures and guidelines tailored to ensure the appropriate treatment of their stakeholders’ information. All our guidelines and procedures have been developed with these principles in mind as outlined in the rest of this document.

#### **Accountability**

Sistering is responsible for the personal information under our control. In order to fulfill this responsibility, we have designated managers to be responsible for the day to day care and control of personal information and have taken the following measures to ensure compliance with the Privacy Policy:

- (a) Developed procedures to protect personal information;
- (b) Developed procedures to receive and respond to complaints and inquiries;
- (c) Trained our staff about our policies and practices respecting personal information; and
- (d) Developed and distributed information to our stakeholders (staff, donors, community, etc.) explaining our policies and procedures respecting personal information.

#### **Identifying Purposes**

Sistering will identify the purposes for the collection of personal information no later than at the time when said information is collected.

Sistering needs to collect, use and disclose some information about our various stakeholders in order to conduct our ongoing operations. The purposes for this include, but are not limited to, the following:

- (a) To establish and maintain relationships with the community members, tenants clients, staff, directors, etc.;
- (b) To manage and develop our operations, including human resources functions;
- (c) To acknowledge donations, issue tax receipts and keep donors informed of special events and fundraising opportunities;
- (d) to assess and/or provide services for the needs of people accessing our programs;
- (e) to determine eligibility for the program participation, volunteerism or other Sistering activities;
- (f) to enhance and ensure safe services and space at Sistering
- (g) to collect data for statistical purposes;
- (h) to assess the needs of our overall community and determine appropriate responses;
- (i) to meet legal, regulatory and contractual requirements;
- (j) to represent programs, services and charitable opportunities that benefit the people we serve.

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Staff and volunteers collecting personal information must explain the purpose of the collection of the individuals they are collecting information from. Unless required by law, staff and volunteers shall not collect information for other purposes than those listed above. Should collection of information become desirable, the staff or volunteer must contact the supervisor for the area prior to proceeding with collecting the information.

Sistering requires the consent of individuals for the collection, use or disclosure of personal information about them, except where consent is not required by law (see below).

As noted above the purpose for collection of personal information is explained no later than the time at which the information is collected. We must then receive an indication of consent from the individual in one of two ways.

Implied consent is when an individual takes a conscious action that indicates they trust us to handle their personal information. Implied consent is received when participants register for programs, donors submit pledge forms, staff accepts employment, and when volunteers or students accept a placement with us.

Explicit consent is when the individual signs a form authorizing us to collect personal information about them. This is appropriate when dealing with sensitive personal information (i.e. medical and financial).

Individuals may withdraw their consent for Sistering collection, use or disclosure of their personal information at any time, subject to legal or contractual restrictions. Individuals wishing to withdraw their consent should do so in writing to "Privacy Officer, Sistering 962 Bloor St. W., Toronto, Ontario M6H 1L6.

## **Exception**

### **Consent**

Is not required where it is clearly in the best interest of the individual for Sistering to collect information about them for the purpose of ensuring their personal safety. This would include emergency situations where the life, health or security of the individual is threatened.

### **Limiting Collection**

Sistering restricts the collection of personal information only to that information that is necessary for the purposes noted above. We are committed to collecting personal information in a fair, open and lawful manner.

Generally information will be collected directly from the individual. Information will only be collected from other sources with the consent of the individual (i.e. personal references, credit checks, etc.)

To ensure the highest possible standard of privacy, Sistering will avoid collecting personal information where possible and will also endeavor to collect non-identifiable information where appropriate.

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## Limiting Use, Disclosure, and Retention

Sistering does not use personal information for purposes other than those for which it was originally collected, unless it has first obtained the consent of the person from whom such information was received or as required by law. We retain personal information only for as long as it is needed for fulfillment of the purposes for which it was originally collected.

## Accuracy

Personal information shall be as accurate, complete and up to date as is necessary for the purposes for which it is to be used.

Personal information by Sistering shall be sufficiently accurate, completed and up to day to minimize the possibility that inaccurate information is being used to make a decision about an individual

If staff and volunteers are aware of any inaccuracy or changes in their personal information that Sistering holds about them, please contact the Human Resources department or staff contact if a volunteer. Staff handling personal information shall update personal information about participants, members, donors, parents/guardians, staff and volunteers, as and when necessary. Speak with your Manager or Director if you have questions about correction requests or on how accurate, complete and up to date personal information needs be.

## Safeguards

Sistering shall protect personal information by security safeguard appropriate to the sensitivity of the information.

All staff and volunteers with access to information shall be required as a condition of employment or volunteer role, to respect the confidentiality of personal information.

The more sensitive personal information is, the more security is required. Speak with your Manager or Director for more information on safeguards appropriate to the sensitivity of personal information in your program or service area.

Staff shall protect personal information in their control (regardless of format) against such risks as loss or theft, unauthorized access disclosure, copying, use, modification or destruction, through appropriate security safeguards/

Safe guards may include physical measures (such as locked door, locked file cabinets), organizational measures (such as staff training, limited access, and security clearances) and technological measures (such as passwords, anti-virus software for computer systems).

Personal information shared with a third party for processing shall be protected through contractual agreements with requirements for confidentiality and appropriate safeguards.

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## Openness

Sistering shall make readily available to individuals, information about its procedures and practices relating to the management of personal information.

Information on the Drop-In's commitment to privacy is available to the public on the Sistering web site at [www.sistering.org](http://www.sistering.org) or by contacting Sistering's Communications Department. Staff and volunteers shall make known upon request the contact information for the Director to whom inquiries or complaints can be forwarded.

## Individual Access

Sistering shall upon request inform an individual of the existence, of use and disclosure of her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Staff and volunteers shall refer request about personal information held about an individual to their Manager or Director.

Staff shall immediately inform their Manager or Director for request for access by an individual of her personal information collected by the Drop In. A Director shall respond to a written request for individual access by providing access to the individual's data except in limited circumstances. See exceptions to access below.

In order to safeguard personal information, an individual may be required to provide sufficient identification information to permit the Drop In to account for the existence, use and disclosure of personal information, and authorize access to the individual's file.

A Director or designate shall provide the individual a reasonable opportunity to review and challenge the accuracy and completeness of personal information. A statement of disagreement will be attached to records where a requested amendment cannot be made.

Upon request, a Director shall provide an account of the use and disclosure of personal information. A list of organizations to which the Drop In may have disclosed personal information shall be provided, when it is not possible to provide a list of actual disclosures.

Staff can request access to their employee file by contacting the Human Resources department.

## Exceptions to Access

The Centre may not be able to provide an individual with access to some or all of her personal information in certain circumstances permitted by law. Some exceptions include if:

- (a) Doing so would likely reveal personal information about a third party;
- (b) Disclosure could reasonably be expected to threaten the life or security of another individual
- (c) Information was collected in relation to the investigation of a breach of an agreement, or a contravention of laws, or otherwise permitted by law.

If access to personal information cannot be provided, a Director shall provide the individual with written reasons for denying access.

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## **Challenging Compliances**

An individual shall be able to challenge compliances with the principles in this document to the designated Privacy Contact for Sistering compliances.

Staff and volunteers shall refer any inquiries or complaints about the Drop In handling of personal information to the manager for the relevant area for response in a fair and timely manner.

Individual my contact the Executive Director to discuss their question about Sistering's information handling practices at: Telephone (416) 926-9762 Ext. 226.

Staff should encourage individuals with a complaint or concern to talk to the Manager or Director responsible for the relevant Sistering program area. In most cases, talking with senior staff will resolve a complaint.

If the problem is not resolved to the individual's satisfaction, the individual may contact the Sistering Privacy Contact. The individual will be asked to provide the Sistering Privacy Contact with the following information in writing:

- (a) Name, address or fax number where the individual prefers to be reached
- (b) Nature of the complaint, relevant details, what the individual would like us to do;
- (c) Name of Sistering staff with who the individual has already discussed the issue.

The Sistering Privacy Contact will immediately forward a privacy complaint to the attention of the Executive Director. The Director will work with the Sistering Privacy Contact to investigate privacy complaints. If a complaint is found to be justified, the Drop In shall take appropriate measures to resolve the complaint.

## **Ongoing Relevancy**

The Drop In regularly reviews its policies and procedures to ensure we remain currant with changing laws and evolving public expectations.

## **Available Resources**

Contact your Manager or Director for more information on the Drop In's commitment to privacy. Also, the following websites provide useful information on privacy;

- (a) Information and Privacy Commissioner/Ontario <http://www.ipc.on.ca>
- (b) Privacy Commissioner of Canada <http://www.privcom.gc.ca>

# SISTERING

## Definitions

**Stakeholders** are individual or groups with an interest in the effective and responsible management of Sistering. Stakeholders influence programs, services and policies. In the case of Sistering stakeholders include, but are not limited to, community members, clients, donors, funders, staff, board, volunteers, student placements, clients, service users, and customers.

**Explicit Consent** is a signed consent to collect information form. This is required when sensitive data is being collected.

**Implicit Consent** is the circumstance where an individual's consent to collecting information is understood by the fact that the individual consciously made the decision to provide Sistering with the information. This would include employment agreements, donation information, etc.