

Big Brothers Big Sisters of Oxford County

Human Resources:

Protection of Privacy Policy

Approved by: BBBS Board

Policy Number: 2.1

Date of Approval: March 18, 2008

National Standard G1b

Review Date: February 2025

Number of Pages: 2

Policy Statement:

- Personal information is any information that can identify an individual, such as: name, address, age, credit card or banking information. Information that is publicly available, such as telephone book listing, is not considered to be personal information.
- Personal Information will be obtained only for reasonable purposes. The Agency is committed to maintaining the accuracy and confidentiality of personal information.
- The agency will make every reasonable effort to ensure personal information is secure and keep the information only as long as is reasonable.
- Personal information will be disclosed or used only for reasonable purposes, and those purposes will be shared with the individual prior to disclosure or use. Permission will be sought where necessary.
- The personnel files and records of past and current clients are the exclusive property of the Agency, and are accessible only to the members of the agency's professional staff as authorized by the Executive Director, and to other agency staff authorized by him/her for record keeping, evaluation and research purposes.
- All confidential data and information concerning the Agency and obtained by staff during the performance of services shall be maintained in confidence both before and after the termination of their services.

Rationale:

- i. This policy spells out the responsibility of the Agency, its employees and volunteers, regarding the collection, use and disclosure of personal information in respect to their activities as a not-for-profit organization.
- ii. In the normal course of business, staff acquires information about certain matters which are confidential to the Agency, and to individuals and organizations with who the Agency conducts activities. Disclosure of such confidential information could be damaging to the Agency and others, and could constitute a breach of privacy rights of the Agency and others.

Procedures:

1. Privacy Officer:

- a. The Executive Director is the designated Privacy Officer.
- b. Requests for information about the Agency's management of personal information will be directed to the Executive Director. Requests should be in writing.
- c. The Executive Director will be familiar with this policy and both Federal and Provincial legislation. The Executive Director will ensure that staff is familiar with this policy, the principles of privacy protection and how this policy affects their jobs.

2. Gathering and Disclosure of Information:

- a. Personal staff information is collected for such purposes as payroll and benefits; and hiring/performance reviews.
- b. During the term of employment with the Agency, or at any time thereafter, staff shall not (except in the proper course of their duties as specified in their work agreements, or as required by law) disclose to any other person or organization without the previous consent in writing of the Agency, any confidential information. Staff shall not use or permit others to use any such confidential information, or make copies of any documents containing such confidential information, except

as may be authorized by the Agency. or required in the course of their duties (in which case staff will ensure copies remain confidential), or as required by law.

- c. Staff shall advise the Agency of any unauthorized disclosure or use of any confidential information of which they become aware at any time while employed by the Agency, whether or not they are directly involved in such disclosure.
- d. Upon the cessation of employment for any reason, or at any time at the request of the Agency, staff will deliver to the Agency any and all records obtained or generated by them in the course of their duties with the Agency. All documentation, of whatever nature, including email, generated by staff during the course of their employment shall be the property of the Agency exclusively.

i. The provisions immediately above shall be incorporated into employee work agreements.

ii. The approved policy will be available on the agency website.

Relevant History	
Date	Notes
November 14, 2007	Approved by Big Brothers Board
March 18, 2008	Approved by Big Brothers Big Sisters Board
February 17, 2009	No change
February 15, 2011	No change
February 2013	No change
February 2015	No change
February-March 2017	No change
February 2019	No change
February 27, 2018	No change
February 19, 2019	Addition of original date of approval – format update, addition of the policy to the website. Corresponding National Standard
February 16, 2021	Removal of gendered language throughout document. Identifying email as documentation that is property of the agency.
February 21, 2023	No change suggested.