



Privacy Policy

Date Effective: February 21, 2017

Reviewed by: Board Executive Committee

Approved by: The Board of Directors

Policy Purpose:

The purpose of this policy is to outline Action Read's position regarding privacy of information for its members, defined here as learners, clients, volunteers, staff, donors and stakeholders.

Action Read respects the privacy of all its members and we make every effort to follow all legal requirements regarding privacy policy. We will ensure that appropriate safeguards are in place to protect the information that we hold for the purpose of our programs. Personal and sensitive private information is used solely for the purposes outlined at its collection.

Definitions:

Personal information is a term that describes most types of information that can be used to identify an individual, regardless of whether the individual is a learner, client, volunteer, staff, donor or stakeholder. Examples include name, home address, telephone number and e-mail address.

Sensitive private information is any personal information that, if lost, compromised, or disclosed without authorization, could result in harm, embarrassment, inconvenience or unfairness to an individual or to Action Read. Examples of sensitive private information include such things as the contents of human resource files, social insurance numbers, police records checks or salary information.

Accountability:

Action Read will be responsible for safely storing and handling all personal information. The Executive Director will act as the Privacy Officer and will be responsible for ensuring that Action Read makes every effort to follow all appropriate privacy legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA). The Executive Director will also be responsible for ensuring that this Privacy Policy is being applied, and that all staff / volunteers receive appropriate training to follow it. Action Read will do its best to respond to questions about collection practices or records containing personal information within a reasonable timeframe.

Purpose of Collection of Information:

Action Read understands that some of the information we collect is personal. We collect this information only for the following purposes: 1) to provide ongoing service and support to members; 2) to appropriately screen volunteers and staff who may be in a position of trust with Action Read learners and clients; 3) to develop, enhance, market or provide opportunities consistent with our



mandate; 4) to maintain, manage and develop our programs through statistics, feedback and support; 5) to meet government and program requirements.

Action Read will clearly explain the reasons for collecting personal information from our members and how the information will be used and disclosed. If Action Read would like to use or disclose personal information in ways other than those outlined at the time of its collection, we will first obtain member consent.

Consent:

All members will be required to give their written consent when asked to provide personal information. In the context of their relationship with Action Read, members consent to the collection, use and disclosure of personal information, in order to: 1) receive information, services, programs and opportunities that Action Read believes respond to member needs and interests; 2) answer member questions and concerns; 3) meet legal and regulatory requirements; 4) contact members in the unlikely event of a privacy breach.

Anyone asked to provide information has the choice to refuse or withdraw his or her consent at any time. Members can also ask to see their personal information, and can make any corrections as appropriate. Members will be told that the withdrawal of consent may result in the loss of certain privileges, services and supports. Consent may not be withdrawn if personal information must be used or disclosed in accordance with the law or the provisions of a contract, or in the context of an investigation or a data security breach.

Staff will make sure that when members sign an Employment Ontario contract, they are aware that they are agreeing to the Ontario Ministry of Advanced Education and Skills Development's (MAESD) collection, use and disclosure of their personal information, as outlined in the "Notice of Collection" portion of the contract.

Limiting Collection:

Action Read only collects personal information that is an absolute business necessity. Information will always be collected in a fair and lawful way. When personal information is collected and stored, safeguards will be implemented that are appropriate to the level of sensitivity and risk. All staff will undergo training in how to use, share, store and protect personal information, as well as the consequences for breach of privacy.

Sensitive private information is subject to extra care in its management. Staff access to sensitive private information is based upon the demands of their position, as outlined in their job description. In the limited instance where select volunteers or subcontractors have access to sensitive private information, training on this policy will be provided as appropriate.



Limiting Use and Disclosure:

Personal information will only be disclosed or used for purposes that members have consented to. Information will only be given to a third party with the written consent of the member.

Action Read does not rent, sell or trade private information or mailing lists with any other organization or business.

Retention:

Personal information will be kept only as long as is necessary and is required for the fulfillment of the purposes for which it was collected. We outline our retention practices in our Privacy and Document Retention Protocols.

Disposal of Records:

Action Read will take all reasonable steps to ensure that personal information is permanently destroyed when no longer required. These include paper and electronic records.

Accuracy:

Action Read is committed to ensuring that our records of personal information are kept as accurate, complete and up-to-date as possible. Our Data Integrity Protocols outline practices to support accuracy of data. Members are asked to inform Action Read staff of any changes to their personal information.

Safeguards:

Personal information will be protected by security measures appropriate to the sensitivity of the information.

Openness:

Through this Privacy Policy and the Website Privacy statements, Action Read will strive to make information readily available about its personal information management practices.

Individual Access:

Members will be given access to their information within a reasonable timeframe, upon request. Members can always challenge the accuracy of their information and have it updated as appropriate.

Privacy Complaints:

Action Read will follow its Complaints Resolution Policy in response to privacy complaints.



Privacy Breaches:

A privacy breach is the loss of, unauthorized access to, or disclosure of, member personal information. Some of the most common privacy breaches happen when personal information is stolen, lost or mistakenly shared. Employees understand that there could be severe consequences, up to and including dismissal, for privacy breaches that are a result of intentional breaches or gross carelessness.

If there is suspicion or evidence of a breach, the Privacy Officer will oversee four key response steps:

- (1) **Assess** the type of personal information involved. This will help contain the breach, determine how to respond to the breach, who should be informed, and what form of notification to the individuals affected, if any, is appropriate.
- (2) **Evaluate** the risks associated with the breach including the personal information involved, the cause and extent of the breach, the individuals affected by the breach and the foreseeable harm that could come from the breach.
- (3) **Notify** If a privacy breach creates a risk of harm to the individual, those affected should be notified. Prompt notification may help members mitigate damage by taking steps to protect themselves.

The Privacy Officer will immediately notify the Ministry of a potential or an actual breach of any of the privacy protection provisions of the Agency Agreement, and fully cooperate in any audit or investigation of any privacy breach.

The Privacy Officer will contact the police if theft or other crime is suspected.

The Privacy Officer will contact the Board Chair if notification is required to any member.

Notifications should include, as appropriate, general information about the incident and its timing; a description of the personal information involved in the breach; a general account of the actions the Privacy Officer has taken to contain the breach and reduce the harm; how Action Read will assist individuals and what steps individuals can take to avoid or reduce the risk of harm or to further protect themselves.

- (4) **Prevention** Once the immediate steps are taken to alleviate the risks associated with the breach, Action Read will investigate the cause of the breach and devise a prevention plan.

Action Read will consult appropriate legislation around handling privacy breaches, such as can be found at the Government of Canada websites <http://www.tbs-sct.gc.ca/hgw-cgf/oversight-surveillance>, <http://www.tbs-sct.gc.ca/hgw-cgf/oversight-surveillance/atip-aiprp/p-prp/pbmt-togap/pbmt-togap09-eng.asp>, http://www.tcu.gov.on.ca/eng/eopg/publications/sp_privacy_tipsheet.pdf <http://www.csagroup.org/legal/privacy/csa-group-privacy-statement/>

Version: This Privacy Policy replaces the most recent previous version of June 2004