

Policy: <b>Personal Information Protection</b>	
Date Approved: March 27, 2018	Number of Pages: <b>1 of 5</b>
Last Date Reviewed: March 26, 2018	Last Date Revised: March 26, 2018

## Intent

Healthy Families Healthy Futures (HFHF) is committed to safeguarding the personal information entrusted to us by our clients, staff, volunteers and board. We manage your personal information in accordance with Alberta's Personal Information Protection Act and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information. A copy of this policy may be provided upon request or is available on our website.

## Policy for Clients

1. Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, gender, marital or family status, an identifying number, financial information, educational history, etc.
2. We collect and maintain only the personal information that we need for the purposes of providing services to our clients, including:
  - Enrollment of a client in a program
  - For reporting, evaluation, and statistical analysis
  - Only with the written consent of the individual

We normally collect client personal information directly from our clients or from outside sources the client has provided with explicit prior consent. We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information.

3. We ask for written consent to collect, use, or disclose client personal information, except in specific circumstances where collection, use, or disclosure without consent is authorized or required by law. We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We may not be able to provide services if you are unwilling to provide consent to the collection, use, or disclosure of certain personal information. Where express consent is needed, we will ask clients to provide their consent in writing (by signing the appropriate documentation).

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A client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain services if we do not have the necessary personal information.

We may collect, use, or disclose client personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is in an emergency that threatens life, health, or safety. (Policy #556 & #557)

### **Policy for Staff, Volunteers, and Board**

1. Personal information about an employee, volunteer, or board member is collected, used, or disclosed solely for the purposes of establishing, managing, or terminating a work relationship. This information may, in some circumstances, include a Social Insurance Number, a performance review, etc. We will provide current employees, volunteers, or board members with prior notice about what information we collect, use, or disclose and our purpose for doing so.
2. Each employee, volunteer, and board member is required to read and sign the *Letter of Understanding*
3. We collect, use, and disclose personal information to meet the following purposes:
  - Determining eligibility for employment or volunteer work, including verifying qualifications and references
  - Establishing training and development requirements
  - Assessing performance and managing performance issues if they arise
  - Administering pay and benefits (paid employees only)
  - Processing employee work-related claims (e.g. benefits, workers' compensation, insurance claims) (paid employees only)
  - Complying with requirements of funding bodies (e.g. casino)
  - Complying with applicable laws (e.g. Canada Income Tax Act, Alberta Employment Standards Code)

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We only collect, use, and disclose the amount and type of personal information that is reasonable to meet the above purposes. The following is a list of personal employee information that we may collect, use and disclose to meet those purposes.

- Contact information such as your name, home address, telephone number
  - Criminal background checks, vulnerable sector check, and driver's abstract
  - Information from the recruiting process such as educational background, work history, and references; reference information and interview notes; letters of offer and acceptance of employment; policy acknowledgement forms; background verification information; workplace performance evaluations; emergency contacts; etc.
  - Benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short and long term disability, etc. (paid employees only)
  - Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers (paid employees only)
  - Other personal information required for the purposes of our employment or volunteer relationship
  - We will inform our employees and volunteers of any new purpose for which we will collect, use, or disclose personal employee information, or we will obtain your consent, before or at the time the information is collected.
4. In some cases, after your employment or volunteer relationship with us ends, we may be contacted by other organizations and asked to provide a reference for you. It is our policy to not disclose personal information about our employees and volunteers to other organizations, who request references, without advance request and consent of the employee/volunteer (Policy #564). The personal information we normally provide in a reference includes:
- Confirmation that an individual was an employee or volunteer, including the position, and date range of the employment or volunteering
  - General information about an individual's job duties and information about the employee or volunteer's ability to perform job duties and success in the employment or volunteer relationship

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5. We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction.

## Procedure

1. We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information. We use appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records. We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.
2. Individuals have a right to access their own personal information in a record that is in the custody or under the control of HFHF, subject to some exceptions. For example, organizations are required under the Personal Information Protection Act to refuse to provide access to information that would reveal personal information about another individual. If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.
3. You may make a request access to your personal information by writing to the Executive Director of Healthy Families Healthy Futures. You must provide sufficient information in your request to allow us to identify the information you are seeking.
4. You may also request information about our use of your personal information. In addition, you may request a correction of an error or omission in your personal information. We will respond to your request within 30 calendar days. We will

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advise you of any fees that may apply before beginning to process your request (e.g. copying costs).

5. If you have a question or concern about any collection, use, or disclosure of personal information by HFHF, or about a request for access to your own personal information, please contact the Executive Director of Healthy Families Healthy Futures by calling 780-307-2444. If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta  
Suite 2460, 801 - 6 Avenue, SW  
Calgary, Alberta T2P 3W2  
Phone: 403-297-2728 Toll Free: 1-888-878-4044  
Email: [generalinfo@oipc.ab.ca](mailto:generalinfo@oipc.ab.ca) Website: [www.oipc.ab.ca](http://www.oipc.ab.ca)