
1.1. *Client Privacy Policy*

1.1.1. **Application of the Client Privacy Policy**

The obligations of the organization and the duties of the Privacy Officer are identified principle by principle, with specific guidance and examples provided to assist in understanding and carrying out the Privacy obligations to clients and customer.

1.1.2. **Accountability**

The collection or transfer of personal information is the responsibility of ACCES. Accountability for ACCES' policies to protect personal information rests with the Board of Directors. Responsibility for operationalizing these policies rests with ACCES' Privacy Officer.

Others within the organization, for example, Directors, Managers and Coordinators, also have delegated responsibility for personal information protection.

- ACCES is responsible for the protection of all personal information in its custody or control. This includes personal information that has been transferred to a third party for processing on ACCES' behalf or where information has been directly collected by a third party for such processing. Processing is any use of the information by a third party.
- The Privacy Officer is responsible for ensuring that personal information in the hands of a third party processor has a level of safeguards equivalent to, or greater than, would exist if the information had been processed by ACCES directly.
- Privacy Officer retains copies of all such documents to have a record of how consent has been obtained.
- Where personal information is of a sensitive nature (i.e. health related, financial) the express consent method is used whenever reasonably possible. A document will be provided requiring information be provided in a written manner. This document will indicate the purpose and voluntary agreement to provide the information.
- Where consent is obtained orally or electronically, it will be filed with a date-stamped form signed by the person collecting the information, indicating consent was received.
- In situations where the collection of personal information is of a less sensitive nature (i.e. fundraising) ACCES will operate under the opt-out method. Donors or prospective donors are given the opportunity to indicate willingness to participate in trading, retaining, and use of personal information.

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- At any time an individual wishes to withdraw their consent to the collection, use or disclosure of their personal information, a telephone call to the head office ACCES of this decision will be sufficient to remove personal information from the database. On a best effort basis, this action shall be taken within a guideline of 15 days of receiving a request and will be confirmed with a letter advising of the removal of the requested personal information.

1.1.3. Limiting Collection

Only that personal information which has been acknowledged as required for operational purposes will be collected by the organization.

- Our Privacy Officer is responsible for ensuring that the collection of personal information is limited to what is required for each specified purpose.
- ACCES is committed to receiving and storing only that information which is voluntarily supplied by the individual owning the personal information with their full knowledge and consent of the purpose for which it is being supplied.
- ACCES' Privacy Officer will undertake to have a review of all personal information collected throughout the Agency, based on the information determined to be required for identified purposes. This review will be conducted on an annual basis, at a minimum.
- Where information has been collected that is no longer required to fulfill its specified purpose, the information will be rendered anonymous, deleted, or destroyed in a secure, non-reversible way in order to prevent further access or use of the information.
- Records confirming the destruction, deletion or alteration of personal information are maintained in the offices of the Privacy Officer in an effort to ensure accurate response to any inquiries or access requests about personal information that may have been rendered anonymous, deleted or destroyed and the date upon which this might have occurred. Records confirming the destruction, deletion or alteration of personal information are maintained in the offices of the Privacy Officer in an effort to ensure accurate response to any inquiries or access requests about personal information that may have been rendered anonymous, deleted or destroyed and the date upon which this might have occurred.

1.1.4. Limiting Use, Disclosure and Retention

Personal information will be retained as long as it is required to satisfy the intended purposes, and in compliance with any laws surrounding information retention.

- ACCES' Privacy Officer will review the list of purposes identified by the organization and will ensure that personal information is used or disclosed only in accordance with those purposes.

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- Where a new purpose, not previously listed, is identified, this new purpose will be documented, including the commencement date for the new purpose, and the information elements required for this new purpose listed.
 - Should new information that is collected come directly from individuals themselves.
 - Regarding client information, our Privacy Officer will ensure that privacy training emphasizes the need for managers to seek to make decisions about individuals based on accurate, complete and up-to-date personal information. At ACCES, a Personal Information Form is available from the Human Resources office clients to update their personal information. All staff involved in the collection of information is encouraged through orientation and training sessions to ensure personal information is up-dated annually.
 - In the case of donors, regular opportunities are given through solicitation campaigns, to update their personal information.

1.1.5. Safeguards

All means possible are used to protect and safeguard personal information on file with ACCES.

- ACCES' Privacy Officer annually reviews the safeguards in use within the organization and its affiliates to physically protect personal information in paper and electronic form.
- ACCES maintains standards for ensuring the privacy of personal information through physical safeguards. In general staff meeting a reminder to employees about the need to protect the confidentiality of personal information is issued by the Privacy Officer or his/her designate.
- In collaboration with ACCES' Privacy Officer, other senior management team members will assign access to information rights, based on their staff's need to know information to perform their functions at ACCES. A listing of which staff has access to what information, electronic or paper, is maintained by the Privacy Officer and updated quarterly.

1.1.6. Openness

Transparency is a way of doing business for ACCES. The policies and procedures are documented and open to all individuals.

At the direction of the Privacy Officer, ACCES will ensure that sufficient information is provided to donors, clients, employees and volunteers about the ACCES Privacy Policy. The Privacy Policy has been adopted and distributed appropriately through several different means.

1.1.7. Individual Access

At any time, individuals are entitled to view their personal information on file with ACCES

Individuals who wish to review the personal information ACCES retains on them may do so at any time. By contacting ACCES, Chief Privacy Officer at the Toronto Office, the personal file inspection within 15 days of receiving the individuals written request.

In consideration of workload responsibilities, the Privacy Officer may delegate to the Manager accountable for retaining this information, to be present at the time of viewing the file.

In responding to a formal written access request, a standard and through process will be undertaken to uphold the ACCES privacy principles in this Policy.

1.1.8. Challenging Compliance

As the goal of ACCES is to be the agency of choice in providing services to individuals requiring assistance with assimilation into the workforce and community at large, and such are very committed to transparency and openness.

ACCES assures each individual that our Privacy Officer will contact any individual registering a concern about compliance to the Privacy Policy within 3 days of receiving such a concern or complaint to acknowledge receipt.

If further investigation is required, our Privacy Officer will document the results of his/her investigation and forward a copy of the investigation results to the complainant generally within the standard of 15 days. The communication will, where warranted, indicate corrective action taken.

It is recognized that should the Federal Privacy Commissioner be involved in investigating or auditing ACCES under the laws of PIPEDA, the Agency's Privacy Officer will be involved in any such situations.

Individuals who are not satisfied with the responses of ACCES have the right, and are encouraged, to contact the Federal Privacy Commissioner directly.

Where a Privacy Commissioner investigation proceeds, ACCES' Privacy Officer will be in charge of the process within ACCES and follow specific and thorough process of steps to uphold the Principles of this Policy.