

Policy: Privacy

Policy # 6 **Number of Pages: 2** **Date of Approval:** Sept 2004

Approved By: Board of Directors, Management **Review Date:** April 2017

References: Privacy and Confidentiality Guidelines
 Special Works: Program Policies and Procedures
 Board of Directors – Confidentiality Annual Agreement

Statement:

The Society of Saint Vincent de Paul, Toronto Central Council (hereinafter referred to as the “Society”) does not trade, rent or sell any personal information to third parties.

Accountability:

The Society is responsible for protecting an individual’s personal information under its control. Examples of personal information include name, address, and financial information used at the conference level. The Executive Director shall be responsible for the ensuring the Society’s compliance with the Federal Personal Information Protection and Electronic Documents Act (PIPEDA) and its ten Privacy Principles (even though the legislation, which addresses “commercial activities”, does not directly impact our operations and procedures). Only authorized members of staff and volunteers have access to an individual’s personal information.

Identifying Purposes:

Donors: The Society will collect only the basic information necessary to generate charitable income tax receipts.

Recipients: The Society and its volunteer members will collect only information necessary to fulfill their role as stewards of the donated funds and to aid in determining levels of financial support to be offered by the Society. For recipients who request Christmas assistance, the recipient’s name, with their permission may be forwarded to the Christmas Bureau for registration purposes.

Vincentians shall not keep copies of a recipient's identification and must demonstrate restraint and concern in the handling of all personal information.

Consent:

Proper and informed consent shall be obtained in the event that an employee, volunteer or Vincentian requires additional information from a client, neighbor in need or employee, or in the event that the client, neighbor in need or employee's personal information or situation is to be discussed with anyone outside of the prescribed relationship.

Confidentiality Agreements:

Employees: Program Specific and co-Signed by Management – on file with program files

Vincentians: Signed with application/screening package – on file at head office

Board of Directors: Signed annually – on file at head office

Safeguards:

Each Vincentian, volunteer or employee who works with personal information will ensure it is only available to authorized persons and only used for the purposes for which it was collected.

Safeguards are in place to protect personal information from theft as well as unauthorized access, disclosure, copying or modification. Persons who have access to personal information shall sign a confidentiality document prior to gaining access to this information.

Risk Management:

The Society completes an annual risk management assessment which includes an assessment of internal controls. Networked systems, data and financial information is secured through a management approved process; inclusive of off-site storage for computer network back-ups.

Program Specific Information Management:

Employees will receive training in information management as directed by funders for the various Special Works. It is understood that employees must, from time to time, sign privacy agreements specific to funder requirements. Copies of these agreements shall be kept on file by the affiliated program management team.