



PRIVACY POLICY

1.1 Accountability

SRABC is responsible for personal information under its control and shall designate an individual to be accountable for the organization's compliance with the following principles.

- The Chair and Executive Director of SRABC has ultimate accountability for protecting the personal information of participants, staff, volunteers, donors and others associated with the organization. The Chair and Executive Director is supported in this activity by delegating the day-to-day operational privacy responsibilities to another individual. All staff and volunteers, agents and other authorized parties share the responsibility for adhering to SRABC privacy policies and procedures.
- The Chair and Executive Director or designate of SRABC has been appointed to oversee organizational compliance.
- SRABC is responsible for personal information in its possession or custody, including information that has been transferred to a third party for processing. SRABC will use contractual or other means to provide a comparable level of protection while the information is being processed by the third party.
- SRABC shall implement policies and practices to give effect to this policy, including:
 - Implementing procedures to protect personal privacy;
 - Establishing procedures to receive and respond to complaints and inquiries;
 - Training and communicating with staff and other parties about their obligations and responsibilities.

1.2 Identifying Purposes

SRABC shall identify the purposes for which personal information is collected at or before the time the information is collected. The primary purposes are the delivery of services, fund raising, quality management, research, billing and meeting legal and regulatory requirements.

- Identifying the purposes for which personal information is collected at or before the time of collection allows SRABC to determine the information they need to collect to fulfill these purposes.
- The identified purposes are specified at or before the time of collection to the individual from whom the personal information is collected. Depending upon the way in which the information is collected, this can be done orally or in writing. A service level agreement form, for example, may give notice of the purposes.
- When personal information that has been collected is to be used for a purpose not previously identified, the new purpose shall be identified prior to use. Unless law requires the new purpose, the consent of the individual is required before information can be used for that purpose.
- Persons collecting personal information should be able to explain to individuals the purposes for which the information is being collected.



1.3 Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

In certain circumstances personal information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical, or security reasons may make it impossible or impractical to seek consent. When information is being collected for the detection and prevention of fraud or for law enforcement, seeking the consent of the individual might defeat the purpose of collecting the information. Acquiring consent may be impossible or inappropriate when the individual is cognitively impaired, seriously ill or psychotic and the substitute decision maker is not available. (Additional information regarding this subject can be found in the Health Care Consent Act and the Substitute Decisions Act.)

- Consent is required for the collection of personal information and the subsequent use or disclosure of this information. Typically SRABC will seek consent for the use or disclosure of the information at the time of collection. In certain circumstances, consent with respect to use or disclosure may be sought after the information has been collected but before use (for example, when SRABC wants to use information for a purpose not previously identified).
- The principle requires “knowledge and consent”. SRABC shall make a reasonable effort to ensure that the individual is advised of the purposes for which the information will be used. To make the consent meaningful, the purposes must be stated in such a manner that the individual can reasonably understand how the information will be used or disclosed.
- SRABC as a condition of the supply of a product or service, require an individual to consent to the collection, use, or disclosure of information beyond that required to fulfill the explicitly specified and legitimate purposes.
- The form of the consent sought by SRABC may vary, depending upon the circumstances and the type of information. In determining the form of consent to use, SRABC shall take into account the sensitivity of the information.
- In obtaining consent, the reasonable expectations of the individual are relevant. For example, an individual seeking service/admission should reasonably expect that SRABC, in addition to using the individual’s name and address for administration purposes, would also contact the individual to advise on the availability or change in the level of service provided. On the other hand, an individual would not reasonably expect that personal information given to a Program Instructor would be given to a organization selling accessibility products, unless consent were obtained. Consent shall not be obtained through deception.
- The way in which SRABC seeks consent may vary, depending on the circumstances and the type of information collected. SRABC will generally seek express consent when the information is likely to be considered sensitive. Implied consent would generally be appropriate when the information is less sensitive. An authorized representative can also give consent.



- Individuals can give consent in many ways. For example:
 - A service agreement form may be used to seek consent, collect information, and inform the individual of the use that will be made of the information. By completing and signing the form, the individual is giving consent to the collection and specified uses;
 - A check off box may be used to allow individuals to request that their names and addresses not be given to other organizations. Individuals who do not check the box are assumed to consent to the transfer of this information to third parties;
 - Consent may be given orally when information is collected over the telephone;
 - Consent may be given at the time that individuals use SRABC product or service.
- An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. SRABC will inform individuals of the implications of such withdrawal.

1.4 Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by SRABC. Information shall be collected by fair and lawful means.

- SRABC shall not collect personal information indiscriminately. Both the amount and the type of information collected shall be limited to that which is necessary to fulfill the purposes identified.
- The requirements that personal information be collected by fair and lawful means is intended to prevent SRABC from collecting information by misleading or deceiving individuals about the purpose for which information is being collected. This requirement implies that consent with respect to collection must not be obtained through deception.

1.5 Limiting Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

- If SRABC uses personal information for a new purpose, it will document this purpose.
- SRABC will develop guidelines and implement procedures with respect to the retention of personal information. These guidelines will include minimum and maximum retention periods. Personal information that has been used to make a decision about an individual shall be retained long enough to allow the individual access to the information after the decision has been made.
- Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased, or made anonymous. SRABC will develop guidelines and implement procedures to govern the destruction of personal information.



1.6 Accuracy

Personal information shall be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.

- The extent to which personal information shall be accurate, complete, and up to date will depend upon the use of the information, taking into account the interests of the individual. Information shall be sufficiently accurate, complete, and up to date to minimize the possibility that inappropriate information may be used to make a decision about the individual.
- SRABC will not routinely update personal information, unless such a process is necessary to fulfill the purposes for which the information was collected.
- Personal information that is used on an ongoing basis, including information that is disclosed to third parties, will generally be accurate and up to date, unless limits to the requirement for accuracy are clearly set out.

1.7 Safeguards

Security safeguards appropriate to the sensitivity of the information will protect personal information.

- The security safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. SRABC will protect personal information regardless of the format in which it is held.
- The nature of the safeguards will vary depending on the sensitivity of the information that has been collected, the amount, distribution, and format of the information, and the method of storage. A higher level of protection should safeguard more sensitive information.
- The methods of protection should include:
 - Physical measures, for example, locked filing cabinets and restricted access to offices;
 - 'need to know' basis; and,
 - Technological measures, for example, the use of passwords and encryption.
- SRABC will make individuals aware of the importance of maintaining the confidentiality of personal information.
- Care shall be used in the disposal or destruction of personal information, to prevent unauthorized parties from gaining access to the information. Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

1.8 Openness

SRABC shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.



- SRABC will be open about their policies and practices with respect to the management of personal information. Individuals should be able to acquire information about SRABC policies and practices without unreasonable effort. This information shall be made available in a form that is generally understandable.
- The information made available shall include:
 - The name/title and address of the person (privacy officer) who is accountable for SRABC policies and practices and to whom complaints or inquiries can be forwarded;
 - The means of gaining access to personal information held by SRABC;
 - A description of the type of personal information held by SRABC including a general account of its use;
 - A copy of any brochures or other information that explain SRABC policies, standards, or codes; and
 - What personal information is made available to related organizations (e.g. other agencies)
- SRABC may make information on its policies and practices available in a variety of ways. For example, SRABC may choose to make brochures available in its place of business, mail information to its customer, provide online access, or establish a toll-free telephone number.

1.9 Individual Access

Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

In certain situations, SRABC may not be able to provide access to all the personal information it holds about an individual. Exceptions to the access requirement should be limited and specific. The reasons for denying access should be provided to the individual upon request. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security, or commercial proprietary reasons, and information that is subject to solicitor-client or litigation privilege.

- Upon request, SRABC will inform an individual whether or not the organization holds personal information about an individual. SRABC will indicate the source of this information. SRABC will allow the individual access to this information. However, SRABC may choose to make sensitive medical information available through a medical practitioner. In addition, SRABC will provide an account of the use that has been made or is being made of this information and an account of the third parties to which it has been disclosed.
- An individual may be required to provide sufficient information to permit SRABC to provide an account of the existence, use, and disclosure of personal information. The information provided shall only be used for this purpose.
- In providing an account of third parties to which it has disclosed personal information about an individual, SRABC will attempt to be as specific as possible. When it is not possible to provide a list



of the organizations to which it has actually disclosed information about an individual, SRABC will provide a list of organizations to which it may have disclosed information about the individual.

- When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, SRABC will amend the information as required. Depending upon the nature of the information challenged, amendment involves the correction, deletion, or addition of information. Where appropriate, the amended information shall be transmitted to third parties having access to the information in question.
- When a challenge is not resolved to the satisfaction of the individual, the substance of the unresolved challenge should be recorded by SRABC. When appropriate, the existence of the unresolved challenge will be transmitted to third parties having access to the information in question.

1.10 Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals for the SRABC compliance.

The individual will be able to address a challenge concerning compliance with the above principles to Chair or Executive Director.

- SRABC will put procedures in place to receive and respond to complaints or inquiries about their policies and practices relating to the handling of personal information. The complaint process should be easily accessible and simple to use.
- SRABC will inform individuals who make inquiries or lodge complaints of the existence of relevant complaint mechanisms. A range of these mechanisms may exist.

SRABC will investigate all complaints. If a complaint is found to be justified through the internal or external complaint review process, SRABC shall take appropriate measures, including, if necessary, amending its policies and procedures.