

YMCA of Simcoe/Muskoka - Privacy Policy and Principles

Introduction

The federal and provincial governments have passed legislation that require charities and not-for-profit organizations to have in place by January 1, 2004 a privacy policy and public statement, plus a framework for practices to implement the policy and monitoring to ensure compliance.

The following is our Association's privacy policy and statement, plus a set of principles to guide how we implement the policy in practice.

For YMCA Staff and Volunteers

The following Privacy Policy is to be included in our Association Policies and Practices Manual and published in our communication materials and on our website.

"The YMCA strives to ensure that volunteers and staff conduct their relationships with each other, participants and all other Association contacts with integrity, good judgement and fairness. The YMCA respects the right of individuals to the protection of their personal information. The YMCA is committed to maintaining the confidentiality, privacy, and accuracy of personal information it collects, uses and discloses about its participants, members, donors, parents/guardians, staff and volunteers."

Required Reading - Protecting the Privacy of Personal Information:

Personal information is information about an identifiable individual.

- Examples of personal information include, but are not limited to, name, address, gender, age, ID numbers, income, racial or ethnic origin, relationship status, employee files, payment or medical/health records, assessments or evaluations.
- An individual's name *does not* need to be attached to the information in order for it to qualify as personal information.
- Personal information *does not* include name, title, business address, or business phone number of an employee of an organization.

AVAILABLE RESOURCES

The following Web sites provide useful information on privacy:

- Office of the Information and Privacy Commissioner/Ontario
<http://www.ipc.on.ca>
- Privacy Commissioner of Canada
<http://www.privcom.gc.ca>

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Privacy Protection Procedure:

All staff and volunteers must...

Protect personal information by following responsible information handling practices, in keeping with privacy laws. See Required Reading *Protecting the Privacy of Personal Information*. YMCA staff and volunteers having access to personal information *must follow* the ten fair information principles and steps for implementing these principles, in keeping with privacy laws.

PRINCIPLE 1 - ACCOUNTABILITY¹

The YMCA is responsible for personal information under its control and shall designate an individual or individuals who are accountable for YMCA compliance with established privacy principles.

PRINCIPLE 2 - IDENTIFYING PURPOSES

The YMCA shall identify the purposes for collecting personal information before or at the time personal information is collected.

PRINCIPLE 3 - CONSENT

The knowledge and consent of an individual is required for the collection, use, or disclosure of personal information, except where not required by law.

PRINCIPLE 4 - LIMITING COLLECTION

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

PRINCIPLE 5 - LIMITING USE, DISCLOSURE, AND RETENTION

The YMCA shall not use or disclose personal information 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 fulfilment of those purposes.

¹ The ten fair information principles (*in italics*) are required under privacy law.

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PRINCIPLE 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.

PRINCIPLE 7 - SAFEGUARDS

The YMCA shall protect personal information by security safeguards appropriate to the sensitivity of the information.

PRINCIPLE 8 - OPENNESS

The YMCA shall make readily available to individuals, information about its procedures and practices relating to the management of personal information.

PRINCIPLE 9 - INDIVIDUAL ACCESS

The YMCA shall upon request inform an individual of the existence, use and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

PRINCIPLE 10 - CHALLENGING COMPLIANCE

An individual shall be able to address a challenge concerning compliance with the above principles to the designated persons accountable for YMCA compliance.

ONGOING RELEVANCY

The YMCA regularly reviews its policies and procedures to ensure we remain current with changing laws and evolving public expectations.