



Association Name: 211 Information and Referral Services Association

Policy Title: Privacy Policy

Policy Section: Board of Directors

Effective Date: September 2020

Review Date: September 2020

Personnel responsible for development and maintenance of policy:

Board of Directors and Management

Personnel that need to be aware of and understand this policy:

Board of Directors, Management, Volunteers and Staff

NS211 is committed to safeguarding the personal information entrusted to us by anyone who uses our services, volunteers with us or is employed by us. We manage personal information in accordance with Nova Scotia's Freedom of Information and Protection of Privacy Act and other applicable laws. This policy outlines the principles and practices we follow in protecting personal information.

This policy applies to anyone who uses the services of NS211 anyone who volunteers services and to all employees and to any person providing services on our behalf. A copy of this policy is provided to any person on request.

What is personal information?

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, etc.

What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our clients, including personal information needed to:

- Provide information and/or make a referral to a service or program
- Administer intake services to a program or service
- Follow up to determine whether a referral has had the desired impact

We normally do not collect client personal information directly from users. No user of our service is required to provide personal information in order to obtain the information and referral services we provide.

The collection of client personal information may be required for us to administer intake services to a program or service.

We will inform users before or at the time of collecting personal information, of the purposes for which we are collecting the information.



Consent

We will ask for consent to collect, use or disclose personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

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 ask for your express consent for some purposes and may not be able to provide certain 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 normally ask clients to provide their consent orally (in person, by telephone), or in writing (by signing a consent form).

A user of our service 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 products and 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 in any situation, that in our opinion, poses a threat to life, health, or safety of a user of our service or any other person.

How do we use and disclose personal information?

We use and disclose personal information only for the purpose for which the information was collected, except as authorized by law. For example, we may use the contact information of persons who use our service in order to provide referrals to other organizations that provide programs and services.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent.

What is personal employee information?

Personal employee information is personal information about an employee or volunteer which is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. Personal employee information may, in some circumstances, include a Social Insurance Number, a performance review, etc.

We can collect, use and disclose your personal employee information without your consent only for the purposes of establishing, managing or ending the employment or volunteer relationship. We will provide current employees and volunteers with prior notice about what information we collect, use or disclose and our purpose for doing so.



What personal employee information do we collect, use, and disclose?

We collect, use, and disclose personal employee 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
- Complying with applicable laws (e.g. Canada Income Tax Act, NS Employment Standards)

We only collect, use, and disclose the amount and type of personal employee 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
- Employment or volunteer information such as your resume (including 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.

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.

What information do we provide for employment/volunteer references?

In some cases, after your employment or volunteer relationship with us ends, we will be contacted by other organizations and asked to provide a reference for you. It is our policy not to disclose personal information about our employees and volunteers to other organizations who request references without consent. 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

How do we safeguard personal information?

Our first step in safeguarding the storage of personal information is to not collect it in the first place. If personal information is not required to offer our service, (and this is the case with the vast majority of the work we do), then no information will be collected or stored.

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.

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.

We use third party commercially proven software to reduce the risk of cyber security breaches.

Access to records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of NS211, subject to some exceptions. For example, organizations are required under the Freedom of Information and Protection of Privacy 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.

You may make a request for access to your personal information in writing to the attention of the Executive Director, 211 Nova Scotia. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We do not charge fees when the request is for personal employee information. We will advise you of any fees that may apply before beginning to process your request.

Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by NS211, or about a request for access to your own personal information, please contact Name or position title of individual in your organization designated to ensure compliance with PIPA.

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Nova Scotia:

Office of the Information and Privacy Commissioner of Nova Scotia
<https://oipc.novascotia.ca/>