

Privacy and Personal Information Policy

This policy is one section of your staffing agency's OHSP, containing the Privacy and Personal Information Policy. The Table of Contents contains hyperlinks that will direct you to fillable versions of any related documents or forms.

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1. Policy

The purpose of this policy is to define the requirements and expectations as it relates to how the organization will collect, use, and share an employee's personal information.

2. Objective

This policy provides guidelines to employees and management regarding the application of legislative requirements related to an employee's personal information. This policy meets or exceeds compliance under the *Personal Information Protection and Electronic Documents Act (PIPEDA)* and is designed to acknowledge employee statutory needs and preferences while providing consistent service delivery to clients. Where offices are located in provinces/territories that have unique legislation regarding personal information protections, the organization will endeavor to default to the requirement that provides more protection to the employee.

The organization is committed to following the 10 principles of protecting information:

1. Accountability
2. Identifying purposes
3. Consent
4. Limiting collection
5. Limiting use, disclosure, and retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual access
10. Challenging compliance

3. Responsibilities

People 2.0 Workforce Services Canada ULC. (People2.0)

- Establish the Policy and review it annually to ensure compliance with applicable legislation. Some changes to legislation may require more timely reviews to maintain compliance.
- Retain all required records under law, audit these records to ensure compliance with established policy, and take corrective action on any deficient practices or deviations from policy.
- Submit any documents to government agencies upon request to maintain compliance with the legislation.
- Provide to all employees, any legislatively required documents and inform employees of their rights.
- Provide training to supervisors and workers on policy requirements and obligations.

Your Staffing Agency is responsible to:

- Manage the requirements of the organization ensuring operational needs are met while adhering to the requirements of the policy.
- Understand and support employee rights and apply the policy in a fair and consistent manner.
- Providing the employees with access to review their information and request corrections to the information as required.
- Resolve any conflicts arising from the interpretation and application of the policy.

Your Staffing Agency Supervisor is responsible to:

- Understand and support employee rights and apply the policy in a fair and consistent manner.
- Attend required training on the legislation, policy, and any guidelines.
- Provide information for Employees on their rights related to personal information.

Workers are responsible to:

- Review the policy and ask questions to ensure understanding of basic rights.
- Advise supervisor and/or appropriate administrator of incorrect information or request changes to information held, in compliance with legislation.

4. Definitions

What is personal information?

Under PIPEDA, personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- age, name, ID numbers, income, ethnic origin, or
- blood type;
- opinions, evaluations, comments, social status, or
- disciplinary actions; and
- employee files, credit records, loan records, medical records, the existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs).

What is not covered by PIPEDA?

There are some instances where PIPEDA does not apply. Some examples include:

- business contact information such as an employee's name, title, business address, telephone number, or email address that is collected, used, or disclosed for the purpose of communicating with that person concerning their employment or profession;
- an individual's collection, use, or disclosure of personal information strictly for personal purposes (e.g. personal greeting card list); and
- an organization's collection, use, or disclosure of personal information solely for journalistic, artistic, or literary purposes.

5. Process

Personal information collected is necessary to provide employees with services related to qualifications, placement, and assigned employment. Personal information is also used to build and maintain the relationship with the employee to provide high-quality, relevant services.

The organization is responsible for protecting personal information collected, used, or distributed. The designated Privacy Officer is accountable for compliance with this policy and the privacy legislation. If there are questions, comments, or concerns regarding the collection, use, or disclosure of personal information, the Privacy Officer can be contacted by telephone (905)-564-9671 extension 202 or via email sdillon@bellnet.ca.

5.1 Personal Information

Personal information means any information about an individual except your name, business title, business address, business e-mail address, business telephone number, or business fax number.

Personal information that may be collected by the organization for work purposes may include but is not limited to:

- a) name, address, telephone number, email address, and personal emergency contact information
- b) occupation (current and past), work history and pay history, credentials to support training and/or education, language preference
- c) date of birth where required (i.e. benefits) or if requested by the Workers Compensation Board or other government agencies in the event of a workplace injury
- d) social insurance number, work permit number (required by law at the time of hire)
- e) banking information for direct deposit
- f) driver's license number or another photo identification
marital status only if needed for benefits application

5.2 Safeguarding Personal Information:

Access to personal information is restricted to those who need access to perform their work. Personal information may be used for one or more of the following reasons related to providing customer service to the employee: provide employment services including references and employment confirmation, obtain personal benefits, provide a referral to clients, process payment by cheque or direct deposit, provide updates and follow-up to obtain your feedback on our level of service.

5.3 Disclosing or Sharing Personal Information:

The organization does not sell personal information to any outside source. Personal information may be disclosed as required by law to Canada Customs, Workers Compensation Board, Courts, and other government agencies. Personal information may also be shared with third-party service providers including the following: prospective and existing clients, financial institutions (re: direct deposit), insurance companies (re: benefits), staffing services representatives (re: quality assessment and compliance & risk management), and claims management company.

5.4 Retention and Disposition of Personal Information:

The organization retains personal information for the time the employee is referable for employment. When there are legal requirements related to the retention period of personal information, the organization will comply with those requirements. Personal information will be safeguarded against unauthorized access to avoid misuse and fraudulent use.

Personal information will be disposed of after the appropriate retention period using approved methods; including electronic file deletion and paper shredding. A matrix is provided identifying the personal information collected, how it is used, what may be disclosed to others, and how long it is retained. These forms (Matrix) are part of the application and employee acknowledgement (signature) demonstrates informed consent.

6. Recordkeeping

The following table provides a general outline of the types of documents collected by the organization, and why they are collected, shared, and stored.

7. Privacy Policy Matrix

Information Collected	Purpose	Use	Distribution	Storage
Application form misc info, colour confusion, physical limitations, bondable, driver's license, abstracts security, criminal background checks, work availability	<ul style="list-style-type: none"> Supports job placement and skill evaluation 	<ul style="list-style-type: none"> Evaluation and placement Payroll purposes 	<ul style="list-style-type: none"> Potential employers Employment-related Consultants Payroll Compliance & Risk Management Department Claims & HR Management Workers Compensation 	<ul style="list-style-type: none"> File cabinet Electronic storage
Assignment Employee acknowledgement sign-offs	<ul style="list-style-type: none"> Confirms the Assignment Employee has reviewed and acknowledged the staffing agency's rules and regulations 	<ul style="list-style-type: none"> Proof and confirmation of applicant / Assignment Employee acknowledgement and consent 	<ul style="list-style-type: none"> Application form Government bodies Compliance & Risk Management Department Claims & HR Management Workers Compensation 	<ul style="list-style-type: none"> File cabinet Electronic storage
Social Insurance Number	<ul style="list-style-type: none"> Payroll Purposes To identify a Workers Compensation claim 	<ul style="list-style-type: none"> Payroll Purposes/T4 Workers Compensation claim identification EI Purposes (ROE) 	<ul style="list-style-type: none"> People2.0 (Payroll Provider) Compliance & Risk Management Department Claims & HR Management Government Bodies 	<ul style="list-style-type: none"> File cabinet Electronic storage
Birth Date	<ul style="list-style-type: none"> To identify eligibility for employment and/or benefits To identify a Workers Compensation Claim 	<ul style="list-style-type: none"> Deductions for CPP Establishing Workers Compensation claim 	<ul style="list-style-type: none"> Application Form Payroll Compliance & Risk Management Department Claims & HR Management Workers Compensation 	<ul style="list-style-type: none"> Workers Compensation File Cabinet Electronic Storage
Address, telephone numbers and email addresses	<ul style="list-style-type: none"> Payroll Identification Communication Paystubs/JANs Marketing Messages 	<ul style="list-style-type: none"> Payroll purposes T4's Correspondence Communication and emergencies Establishing details in Workers Compensation claim/government claim 	<ul style="list-style-type: none"> Payroll Management/Consultants Compliance & Risk Management Department Claims & HR Management Workers Compensation Government Bodies 	<ul style="list-style-type: none"> File cabinet Electronic storage

Information Collected	Purpose	Use	Distribution	Storage
Salary / work experience, education, and assessments	<ul style="list-style-type: none"> Supports job placement 	<ul style="list-style-type: none"> Evaluation Placement Establishing details in Workers Compensation claim 	<ul style="list-style-type: none"> Potential employers Management/Consultants Compliance & Risk Management Department Claims & HR Management Workers Compensation 	<ul style="list-style-type: none"> File cabinet Electronic storage
Interview verbal and non-verbal and all communication	<ul style="list-style-type: none"> To collect pertinent information 	<ul style="list-style-type: none"> Assignment, skill, and suitability 	<ul style="list-style-type: none"> Application form Compliance & Risk Management Department Claims & HR Management 	<ul style="list-style-type: none"> File cabinet Electronic storage
Disciplinary Action forms / Assignment Employee Performance Evaluation	<ul style="list-style-type: none"> Ensures employment relationship 	<ul style="list-style-type: none"> To evaluate and correct performance and attendance issues 	<ul style="list-style-type: none"> Management/Consultants On-site Supervisors Compliance & Risk Management Department Government Bodies 	<ul style="list-style-type: none"> Electronic Storage File cabinet
Training Documentation	<ul style="list-style-type: none"> To confirm training 	<ul style="list-style-type: none"> To verify training and evaluate skills and training provided 	<ul style="list-style-type: none"> Client Site Consultants Compliance & Risk Management Department Government Bodies 	<ul style="list-style-type: none"> File cabinet Electronic Storage
Banking Information	<ul style="list-style-type: none"> Payroll Purposes 	<ul style="list-style-type: none"> Automatic bank deposit 	<ul style="list-style-type: none"> Payroll Department 	<ul style="list-style-type: none"> Payroll Department
Benefits Information	<ul style="list-style-type: none"> Benefits 	<ul style="list-style-type: none"> To accept or decline benefits 	<ul style="list-style-type: none"> Payroll department Benefits provider 	<ul style="list-style-type: none"> Payroll department Benefits provider
Medical and Medical Release Information	<ul style="list-style-type: none"> To identify limitations Verify an injury To facilitate the management of claims 	<ul style="list-style-type: none"> Workers Compensation claims Explore pre-existing case Medical Assist with an Early and Safe Return to Work 	<ul style="list-style-type: none"> Collected by consultants for the purposes of assisting the return-to-work process Treating Practitioners Compliance & Risk Management Department Claims & HR Management Workers Compensation 	<ul style="list-style-type: none"> File Cabinet Electronic Storage
Photographs	<ul style="list-style-type: none"> Swipe System Security at Client Sites 	<ul style="list-style-type: none"> TimeTrak Access to Client Site 	<ul style="list-style-type: none"> Consultants/Management On-Site Supervisors 	<ul style="list-style-type: none"> Electronic filing At some Client Sites

Please note: Documents may also be viewed by an employer-designated agent depending on the circumstances.