



- To communicate a range of programs, services and philanthropic opportunities that benefit people we serve
- To meet legal, regulatory and contractual requirements

**Staff and volunteers collecting personal information shall use reasonable efforts to explain identified purposes, or refer the individual to a supervisor who shall explain the identified purposes for collecting personal information.**

**Unless required by law, staff and volunteers shall not use or disclose for any *new* purpose personal information that has been collected, without the consent of the individual.**

Educo School acknowledges the consent of an individual is required for the collection, use or disclosure of personal information, except where not required by law (see Exceptions).

**In obtaining consent, staff and volunteers shall advise participants, members, parents, donors, staff, volunteers, independent contractors of identified purposes for which personal information will be used or disclosed. Purposes shall be communicated in clear, understandable language.**

**In general, the following actions by an individual constitute *implied* consent for Educo School to collect, use and disclose personal information for purposes identified to the individual:**

- Registration for Educo School programs and services
- Completion of a donation pledge form
- Acceptance of employment and benefits enrolment by an employee
- Acceptance of a voluntary position

Express consent is required from an individual when dealing with more sensitive information, such as financial, criminal and medical data.

**Individuals may at any time withdraw their consent to Educo School's use or disclosure of their personal information, subject to certain service, legal or contractual restrictions. Individuals wishing to withdraw consent may contact Educo for more information.**

## Exceptions

**Educo School may collect, use or disclose personal information without prior knowledge or consent of the individual in the following limited circumstances:**

- To a lawyer or other legal representative of Educo School, when legal advice is required by the organization
- To a government body or agency in certain circumstances
- To collect a debt or comply with a subpoena, warrant or other court order, or as may be otherwise required by law
- When the collection, use or disclosure of personal information is permitted or required by law
- When the personal information is available from a public source (e.g. a telephone directory)
- In an emergency that threatens an individual's life, health or personal security
- To protect ourselves from fraud
- To investigate an anticipated breach of an agreement or a contravention of law.

Educo School shall limit the collection of personal information to that which is necessary for the purposes identified by Educo School.

**When collecting personal information, staff and volunteers will usually collect it directly from the individuals or guardians about whom the personal information pertains. Personal information may be collected from other sources with prior consent from the individual, for example, from prior employers, personal references or from other third parties having the right to disclose information.**

Educo School 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 for at least a year and after which for only as long as necessary for the fulfillment of those purposes.

**In certain circumstances personal information can be collected, used or disclosed without the knowledge and consent of the individual. See *Exceptions* above under Consent.**

**Personal information used to make a decision that directly affects an individual must be retained for at least one year, after which it shall be retained only as long as necessary for the fulfillment of those purposes for which it was collected or as required by law, or by contract with a funding partner.**

**Depending on the circumstances, where personal information has been used to make a decision about an individual, Educo School shall retain, for a period of time that is reasonably sufficient to allow for access by the individual, either to actual information or the rationale for making the decision.**

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

**Personal information used by Educo School shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inaccurate information is being used to make a decision about an individual.**

**If staff and volunteers are aware of any inaccuracy or changes in their personal information that Educo School holds about them, please contact the Educo School Office Manager or Program Director.**

**Staff handling personal information shall update personal information about participants, members, donors, staff, volunteers, independent contractors, as and when necessary.**

Educo School shall protect personal information by security safeguards appropriate to the sensitivity of the information.

**All staff and volunteers with access to information shall be required as a condition of employment or volunteer role, to respect the confidentiality of personal information.**

**The more sensitive personal information is, the more security is required.**

**Staff shall protect personal information in their control (regardless of format) against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security safeguards.**

**Safeguards may include physical measures (such as locked doors, locked file cabinets), organizational measures (such as staff training, limited access, security clearances) and technological measures (such as passwords, anti-virus software for computer systems).**

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

**Information on Educo School's commitment to privacy is available to the public on Educo School's web site at [www.educo.ca](http://www.educo.ca)**

**Staff and volunteers shall make known upon request the contact information for the Office Manager or Program Director to whom inquiries or complaints can be forwarded.**

Educo School 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.

**Staff and volunteers shall refer requests about personal information held about an individual to the Office Manager or Program Director.**

**Staff shall immediately inform the Office Manager or Program Director of a request for access by an individual to his or her personal information collected by Educo School. The Office Manager shall respond to a written request for individual access by providing access to the individual's data, except in limited circumstances. See *Exceptions to Access* below.**

**In order to safeguard personal information, an individual may be required to provide sufficient identification information to permit Educo School to account for the existence, use and disclosure of personal information, and authorize access to the individual's file.**

**Personal information shall be provided in a format that is understandable, along with any explanation needed to facilitate the individual's understanding in a reasonable time and at minimal or no cost.**

Upon request, the Office Manager shall provide an account of the use and disclosure of personal information. **Educo School does not disclose your personal information unless due to a medical emergency or required by law.**

**Staff can request access to their employee file by contacting the Office Manager.**

### [Exceptions to access](#)

Educo School may not be able to provide an individual with access to some or all of his or her personal information in certain circumstances permitted by law. Some exceptions include if:

- **Doing so would likely reveal personal information about a third party**
- **Disclosure could reasonably be expected to threaten the life or security of another individual**
- **Information was collected in relations to the investigation of a breach of an agreement, or a contravention of law, or as otherwise permitted by law.**

**If access to personal information cannot be provided, the Office Manager shall provide the individual with written reasons for denying access.**

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

**Staff and volunteers shall refer any inquiries or complaints about Educo School's handling of personal information, to the Executive Director for response in a fair and timely manner.**

**Individuals wishing to make a complaint about Educo School's information handling practices will be asked to provide in writing to the Executive Director, the following information:**

- **Name and address or fax number where the individual prefers to be reached**
- **Nature of the complaint and relevant details**
- **If applicable, the name of the Educo School staff with whom the individual has already discussed the issue.**

**Educo School shall investigate all complaints. If a complaint is found to be justified, Educo School shall take appropriate measures to resolve the complaint.**

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