



## 4.3 PRIVACY POLICY

Policy Number	GP 4.3
Approved	June 2011
Revised	

### **POLICY STATEMENT**

The Congregation of the Sisters of St. Joseph of Toronto (the congregation) is committed to protecting the privacy of its vowed members, novices, candidates, employees, associates, volunteers, contractors, donors, and any other persons about or from whom the congregation collects personal information during the course of carrying out all of its activities.

The congregation complies with the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and other applicable legislation and ensures that all personal information is properly collected, used only for the purpose for which it is collected and is disposed of in a safe and timely manner when no longer required.

Any collection of information that occurs through the use of our website is subject to this *Privacy Policy* and the *Website Privacy Policy* of the congregation.

### **SCOPE**

This policy shall apply to the following individuals (also referred to as "CSJ personnel") at all times and in all locations when engaged in the congregation's ministries or business activities:

1. Vowed Members
2. Novices
3. Candidates
4. Employees

5. Volunteers
6. CSJ Associates

## **DEFINITIONS OF PERSONAL INFORMATION**

### **Personal information**

Refers to information about an identifiable individual including:

1. Name, race, ethnic origin, religion, marital status, educational level
2. E-mail address and messages, IP (Internet protocol) address
3. Age, height, weight, medical records, blood type, DNA code, fingerprints, voiceprint
4. Income, purchases, spending habits, banking information, credit/debit card data, loan or credit reports, tax returns
5. Social Insurance Number (SIN) or other identification numbers
6. Personal information does NOT include contact information.

### **Contact Information**

Any information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPEDA.

## **OTHER DEFINITIONS**

In this policy, the following terms have the respective meanings set out below:

<b>Candidate</b>	A woman living with one or more vowed members for a more formal period of discernment of her call
<b>Congregation</b>	The Sisters of St. Joseph of Toronto
<b>The Congregational Leader</b>	The leader of the congregation
<b>Corporation</b>	The Congregation of the Sisters of St. Joseph of Toronto

<b>General Council</b>	The council which is responsible for the general governance of the congregation
<b>CSJ Associate</b>	Single or married women and men who share the mission and spirit of the Sisters of St. Joseph of Toronto.
<b>Employee</b>	An individual employed by the Corporation on a part-time or full-time basis.
<b>Novice</b>	A woman who has not yet taken her vows to become a vowed member and is living with one or more vowed members.
<b>Privacy Officer</b>	Means the individual designated responsibility for ensuring that the congregation complies with this policy and PIPEDA.
<b>Volunteer</b>	An individual volunteering for the corporation on a part-time or full-time basis, who is not a vowed member, novice or candidate.
<b>Vowed Member</b>	A woman who has taken her first profession of vows as a member of the congregation.

### **Privacy Principles**

The congregation's vowed members, novices, candidates, associates, employees, volunteers and contractors who collect, use or disclose personal information for the congregation is required to follow the ten practices outlined below.

#### **1. Accountability**

The congregation is responsible for maintaining and protecting the personal information under its control. The congregation has appointed a privacy officer (see pg. 4 #10) who is responsible for ensuring compliance with this privacy policy.

The congregation's vowed members, novices, candidates, employees, volunteers, contractors and associates are required to protect the confidentiality of information that is available to them solely for the purposes of performing their duties.

## **2. Identifying Purpose**

The congregation collects and uses personal information for a variety of purposes including but not limited to:

1. Providing services within the various ministries of the congregation and its members.
2. Voluntary information related to employment, payroll and benefits.
3. Voluntary information related to volunteer recruitment.
4. Voluntary information from donors for the sole purpose of issuing tax receipts and maintaining a donor list.
5. Voluntary information related to membership and formation.

Any personal information that is collected is obtained lawfully and fairly. The personal information that is collected will be limited to the extent, where practically possible, to that which is required for the purposes that have been identified by us at the time of collection. When personal information is provided to us voluntarily, we will attempt to limit the collection of personal information to the purpose for which it is being voluntarily given.

## **3. Consent**

Consent is obtained from the person whose information is being collected, used or disclosed. Permission may be expressed either in writing, orally or electronically or implied when given voluntarily.

Permission may be withdrawn at anytime, subject to legal, contractual restrictions and reasonable notice.

Information is not released unless appropriate consent is given.

## **4. Limiting Collection**

Personal information collected is limited to that required for the purpose or purposes identified by the congregation and its related activities and is collected in a fair, open and lawful manner.

## **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 person or as required by law. All collected personal information shall be destroyed, erased or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by law.

## **6. Accuracy**

Personal information shall be maintained in as accurate, complete and up-to-date a form as necessary in order to fulfill the purpose for which it was collected.

## **7. Safeguards**

Personal information will be protected by security safeguards that are appropriate to the sensitivity of the personal information. The congregation maintains appropriate physical and technical measures to protect against loss, theft, unauthorized access & disclosure, copying or modification.

Safeguards include:

- a. Physical measures – locked filing cabinets and restricted access to offices
- b. Organizational measures – limiting access on a “need-to-know” basis and security clearances
- c. Technology measures – use of passwords, encryptions and audits

Access to any personal information is restricted to the sisters and employees of the congregation and its volunteers on a “need to know” basis.

## **8. Openness**

Information about the privacy policy of the congregation, as well as the management of personal information, shall be available as requested.

The information includes:

- a. Name and contact information of the privacy officer
- b. A copy of the *Privacy Policy* and its practices related to management of personal information

## **9. Access**

Individuals may make written requests to gain access to their records containing personal information. Individuals shall be given access to information except where the law requires the congregation to deny access.

The congregation will respond to requests within reasonable timelines and cost to the individual as governed by legislation.

## **10. Challenging Compliance**

Complaints or inquiries about the collection, use, disclosure or retention of personal information and the congregation's compliance with these ten principles should be directed to the privacy officer. The privacy officer will investigate complaints and ensure that appropriate measures are taken.

**Privacy Officer:** Joan Breech, CAO Sisters of St. Joseph of Toronto

**Phone number:** 416-467-2628

**Email:** jbreech@csj-to.ca

**Address:** 101 Thorncliffe Park Dr. Toronto ON M4H 1M2

### **Complaint Process**

The privacy officer will respond to all complaints about collection, use, disclosure, storage and disposal of personal information and advise the complainant as to the action being taken and will:

- a. clarify the complaint to clearly identify the issues for investigation
- b. determine the best approach for dealing with the matter
- c. examine relevant records and carry out all necessary interviews
- d. conduct an analysis of the information obtained during investigation
- e. determine whether there is a basis for making findings and recommendations
- f. determine whether action needs to be taken with respect to breach of a confidentiality agreement
- g. if so, contact the parties with the preliminary findings and provide an opportunity for further representation.

If the complaint is substantiated or well-founded, the privacy officer will make an investigation report that contains:

- a. a summary of both sides' positions and what the investigation uncovered;
- b. the findings and recommendations;
- c. any agreement reached by the parties.

Investigations will be conducted in as timely a manner as possible.

However, the following factors often determine how long an investigation will take:

- a. the complexity of a case, or the number of issues to be investigated
- b. the presentation of a legal issue, such as a matter of statutory or legal interpretation, that may need to be examined and settled
- c. the level of cooperation or ease of communication with the parties; or
- d. whether there are opportunities during the course of investigation for early resolution.

Where necessary, the privacy officer will make recommendations to the General Council in connection with the resolution of the complaint.

### **Prevention and Education**

The congregation is committed to the process of educating and informing all CSJ personnel regarding the privacy of personal information. It seeks to do so through the following measures:

1. A copy of this policy will be made available to all CSJ personnel.
2. Information sessions will be held periodically for CSJ personnel.
3. Those in authority will be made aware of their responsibilities under this Policy and PIPEDA

Other Reference:

See: Website Privacy Policy  
Hospital Privacy Policy