

**Ponoka Youth Centre/  
Boys and Girls Clubs of Wolf Creek  
Policy Manual**

**Policy Name:** Privacy Policy

**Policy Number:** 5-A-3

**Policy Statement:**

The Ponoka Youth Centre/BGCWC will protect the privacy and maintain the confidentiality of its staff, participants, donors, volunteers, and stakeholders in compliance with provincial and federal legislation.

**Procedure:**

In accomplishing the work of the agency, a wide variety of information is accessed and accumulated on a regular basis. It is very important to the agency to ensure the privacy of all stakeholders is protected and treated with respect. The following guidelines are in place to ensure that privacy is maintained.

**A. Definitions**

The following definitions apply to the policy.

1. Personal Information
  - a. Personal information is defined as any information that can be used to distinguish, identify or contact a specific individual.
    - i. This information may include an individual's opinions or beliefs, as well as facts about or related to the individual. Examples include: age, marital status, address, and opinions about someone.
    - ii. Exceptions include: information that is available to the public, such as telephone numbers and addresses as published in telephone directories.
    - iii. This also includes information that is organized by the name of an individual, symbol or other particulars that are assigned to an individual.
  - b. Record

A record is defined as a document containing identifying information in any form.

    - i. This information may include: drawings, letters, photographs, and papers that are written, photographed, and stored in any manner, which does not include software or other mechanisms which produce records (FOIP Act 1(q)).

**B. Collection of Personal Information**

The following applies to the collection of personal information.

1. Any collection of personal information will be used for the purpose of offering services, maintaining accountability, program purposes, supervision and continuity of services.

**C. Use of Personal Information**

The following applies to the use of personal information.

1. Staff Member Information
  - a. Staff member information may only be used for the purposes for which it was collected.
  - b. The agency may give reference information to a prospective employer only if the staff member provides the previous employment information and the agency may only disclose factual information that represents the staff member's job performance.
2. Client Information
  - a. Client information may only be used for purposes such as continuity of care, supervision, and case planning.
  - b. Staff members must obtain appropriate consents for any new purposes, such as information sharing.
  - c. Written consent shall be obtained from the client (or parent/legal guardian) before any communication or information is released to any other organization or individual not employed by the agency.
  - d. If clients or participants request that information be shared, they must complete a Release of Confidential Information Form. This form must specify the following information:
    - i. with whom the information will be shared;
    - ii. for what purpose;
    - iii. for how long the consent will remain in effect;
    - iv. a signature and date of signature; and

- v. staff signature and date of signature.
  - e. Client information or communications may be shared within the agency only with staff members involved with a particular client and only for the purpose of service delivery.
  - f. Appropriate agency staff members may review the client's file or share information with agency programs for the purposes of continuity of service and case management.
  - g. Electronic devices that contain client information will be passcode-protected and any databases containing client information will be password-protected.
  - h. Staff members will preserve confidentiality with respect to any identifying information of any person. When delivering services, staff members will not include other clients, friends, or family members without the consent of the client and/or parent/guardian/caseworker.
  - i. Staff members will testify in court regarding client information only if they are subpoenaed.
  - j. Client information or records may be released:
    - i. when they are subpoenaed;
    - ii. where required by law; and
    - iii. where the safety of the child depends upon divulging this information. This could include suspicion of neglect or abuse of a child.
3. Emergency Services
- a. Contacting emergency services for the safety of staff or clients will not constitute a breach of confidentiality.
4. Licensing and Accreditation
- a. Regulatory bodies will be granted access to files for licensing and accreditation purposes only.

**D. Information Requests**

Personal requests are those involving personal information about an identifiable individual.

1. All clients, parents/legal guardians, staff, and volunteers have the right to access their personal information/records in accordance with FOIP.
2. Written consent shall be obtained for inactive files/clients prior to any communication or release of information. The applicant must provide enough detail to identify the record.
  - a. If there are multiple clients assigned to a file (couple/family), then consent must be signed by all parties to access the complete file.
  - b. If all parties do not give consent, then the client may see portions of their file which do not refer to other clients.
  - c. Information relayed by third parties may be blocked.
3. Staff and volunteers may access their employment file by making a verbal or written request to their supervisor.
  - a. All information, except for confidential information collected during reference checks, will be provided.
  - b. If there are informal files on staff that are separate from personnel files, employees also have access to all information contained in these files.
  - c. The agency will make every reasonable effort to respond to a request no later than 30 days after receiving it.
    - i. If additional time is required to produce a record for a request, a reason in writing will be provided to the individual making the request.
  - d. The person making the request may ask to view the record or ask for a copy of the record.
  - e. The person making the request may be charged a fee for copies.
  - f. If the request is for the records of a deceased person, the person making the request must be named as the Power of Attorney of the Will or appointed as the administrator of the estate by the court. The person must also provide proof of death.

Original Date	Revision Date	Board Approval Date	Board Signature
March 2018		April 2018	