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| **Oak Park Neighbourhood Centre** |
| Policy Title: | **Privacy Policy- Full Agency** |
| Approved by: | Oak Park Neighbourhood Centre Board of Directors |
| Approval date: | June 2019 |
| Revision dates: | April 28, 2021 / / / /  |

***Policy Statement***

The federal government has enacted the Personal Information Protection and Electronic Documents act

“PIPEDA”. This act regulates the collection, use and disclosure of personal Information.

**Applicability**

Staff and board

**Information We Collect**

Oak Park Neighbourhood Centre collects the following personal information.

* Member’s name, address, email address, telephone number
* Children’s name and birthdate
* Emergency contact name and phone number
* Medical information (Parents are not denied enrolment if they do not sign consent to release information)

**General Principles and Procedures**

**What We Do with Information**

The information is used to provide us with demographic data for our members, to manage any medical conditions and to have contact information. We are required to allow the Ministry of Education and the Region of Halton to review files for our preschool program to ensure we have complete records and meet staff ratios. Oak Park Neighbourhood Centre will not disclose personal information to any other third parties. All financial records are kept for a period of 6 years from previous year end and are shredded and disposed of at that time. Childcare records, including child registration with admission and discharge dates, child medical history and any doctors’ notes, individualized plan, specific parent instructions for care, attendance & Ministry reports are kept for 3 years from the date of child discharge. Access to personal records without parental consent can only be given to Coroner’s office, courts in response to a warrant or order, Ombudsmen, authorities vested in Provincial or Federal statutes, or Minister and officials to whom the parent has delegated the authority in writing.

**Who Has Access to Member Information?**

The Oak Park Neighbourhood Centre staff has access to all membership and registration forms. Preschool files are locked in a file cabinet and limited information is in the preschool binder. Files are not left out when not in use.

Files are never removed from the building except the binder for emergency evacuation. Member information is

in a binder in a file cabinet at the centre and an electronic copy of the membership list is maintained by staff.

The volunteer coordinator and communications director receive the names and contact information for people

who have expressed an interest in volunteering or asked to be added to the newsletter email list on their

membership form. All board members sign confidentiality agreements. OPNC staff, The Region of Halton and

The Ministry of Education have access to all the records for our childcare program. The emergency contact

information and medical condition information would be passed on to medical staff in case of an emergency.

Family contact information and child support information is kept in the child’s classroom in a binder.

**Board Confidentiality**

All board meetings are open to members however, proceedings at closed sessions of meetings of the Board are confidential. Briefing documents, minutes, reports and other documents identified as confidential are confidential. Confidential information received by a member of the Board or received by anyone else for purposes of a confidential proceeding of the Board or its committees shall not be used, directly or indirectly, for personal gain by the Board member or other person and shall not be divulged to any other person without the prior consent of the Board.  All communications to/from the media about a confidential proceeding of the Board or its committees or about decisions of the Board shall be directed to the Chair or other designated person. All files and information of any sort, including but not limited to, donors, prospective donors, members and/or their families, past and present employees, and past and present volunteers is strictly confidential. Inappropriate discussion and/or use of information to which the Board member may be privileged may be cause for immediate dismissal. Board members are not allowed to use their position for personal or family gain but act in the best interests of the agency and sign a “Code of Conduct” agreeing to this each year.

**Privacy Officer**

Our Board Chair, Joe Mauro has the responsibility of Privacy Officer. He can be reached by leaving a phone message at the centre: **905-257-6029**. He has the responsibility of overseeing all elements of our information handling practices and bringing forward concerns to the Board of Directors.

**Policy Review**

The privacy policy is reviewed with staff at the time of hire and again annually. It is in our policy binder at the front desk and on our website. The policy is reviewed annually with the Board of Directors at a board meeting. Failure to comply with the policy by Board members or OPNC staff will be handled in keeping with our personnel and board policies.