

Policy Type:	<b>Human Resources</b>	Creation Date:	10 06 2024
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		Approval Date:	13 06 2024
Policy Title:	<b>208 Privacy Policy</b>		FINAL

**1.0 Overview**

- 1.1 The Central Alberta FASD Network known hereafter as CAFASD, is committed to safeguarding the personal information entrusted to us by our employees, contractors, students, volunteers, and clients. This privacy policy outlines the practices we follow in protecting our personal information.
- 1.2 This privacy policy applies to the CAFASD Network, and to any person providing services on our behalf. A copy of this privacy policy is provided to any employee, contractor, student, volunteer, or client on request.

**2.0 Purpose**

- 2.1 All employee information is collected, accessed, and archived only for the purposes of delivering requested products and services. We conform to the provincial privacy standards and employee/employer confidentiality standards.

**3.0 Scope**

- 3.1 This policy applies to all employees, volunteers, students, and contractors employed by CAFASD.

**4.0 Policy**

4.1 - Accountability:

We are responsible for personal information under our control, and this responsibility for privacy is the responsibility of the Executive Director or his/her designate.

4.2 Identifying Purpose, Limiting Collection, Consent:

We ask for consent to collect, use or disclose personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is required, we will ask individuals to provide their consent orally, or in writing.

4.3 Limiting Use, Disclosure, Retention:

We use and disclose personal information only for the purpose for which the information was collected, except as authorized by law.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent. We may not seek consent if the law allows this.

4.4 Accuracy:

We shall ensure that the personal information is as accurate, complete, and up to date as required for the purposes for which it is to be used.

#### 4.5 Safeguards:

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure, or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying personal information, including shredding paper records, and permanently deleting electronic records.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal, or business purposes.

#### 4.6 Openness, Individual Access, Compliance:

Individuals have a right to access their own personal information in a record that is in the custody of under the control of the CAFASD Network, subject to some exceptions.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may also make a request for access to your personal information by writing to Julie Nanson-Ashton, Executive Director to ensure compliance with PIPA. You must provide sufficient information at your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to people outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted.

### **5.0 Policy Compliance**

The CAFASD team will verify compliance with this policy through various methods, including but not limited to, internal and external audits, and feedback to the Executive Director.

### **6.0 Related Standards, Policies and Processes**

- 200 – Employee code of conduct
- 201 – Application of policies and procedures
- 204 – Conflict of interest
- 211 – Information handling and security
- 229 – Confidentiality

### **7.0 Revision History**

<b>Date of Change</b>	<b>Responsible</b>	<b>Summary of Change</b>
<b>June 12, 2023</b>	<b>Executive Director</b>	<b>Changed Scope to reflect all policies.</b>
<b>November 2, 2023</b>	<b>Administrative Assistant</b>	<b>No updates – Reviewed and Approved</b>
<b>June 13<sup>th</sup>, 2024</b>	<b>Clinical Supervisor</b>	<b>Amended policy to include privacy for all stakeholders. Renamed the policy to cover all privacy matters.</b>

## 8.0 References

**APPENDIX I**

**Employee/Volunteer Exit Interview Consent for Reference**

I, \_\_\_\_\_, consent to have the following information released to a prospective employer regarding my employment with the Central Alberta FASD Network:

Questions related to the following:

- 1. Attendance, Lateness, Absenteeism \_\_\_\_\_
- 2. Quality and quantity of work \_\_\_\_\_
- 3. Executive Director's reference to character \_\_\_\_\_
- 4. Strengths/Challenges \_\_\_\_\_
- 5. Contributions to team functioning \_\_\_\_\_
- 6. Knowledge in their field \_\_\_\_\_
- 7. Would you re-hire \_\_\_\_\_
- 8. Other \_\_\_\_\_

Employee Name (Printed): \_\_\_\_\_

Signature: \_\_\_\_\_

Executive Director: \_\_\_\_\_

Date Signed: \_\_\_\_\_