

Personal Information and Privacy Policy

Effective Date January 8, 2015

Approval Date January 8, 2015

Review Date January 8, 2018

Policy Statement	<p>OCH collects and uses the personal information of its tenants, employees and business invitees to perform its work. This information is private and OCH commits to respecting privacy by safeguarding the information for the period in which it is in OCH possession and disclosing it only when it is legally appropriate to do so. OCH will ensure that it manages personal information in accordance with the <i>Municipal Freedom of Information and Protection and Privacy Act</i> (MFIPPA) and the <i>Housing Services Act</i> (HSA).</p>
Policy Objectives	<p>This policy will ensure:</p> <ul style="list-style-type: none"> Executive Directors and Directors are responsible for personal information management and privacy within the corporation An OCH Privacy Officer is appointed to oversee and ensure legislative compliance related to personal information management and privacy All employees are appropriately trained and supervised in collecting, using, protecting and disclosing personal information Privacy protection requirements are included in the design of all new business processes, projects and technology Personal information breach protocols are established and reviewed with employees Board and Committee members and business invitees are briefed on their responsibilities to comply with the policy

Organization Organizational Effectiveness	Title/Subject Personal Information and Privacy Policy			
Owner Executive Director Organizational Effectiveness	Approved by Board of Directors	Date January 8, 2015	Version 1.0	Page 1 of 9

Personal Information and Privacy Policy

Policy Principles	<ul style="list-style-type: none"> Having access to the personal information of tenants, employees and business invitees requires integrity and responsible stewardship OCH employees should only have access to information that they need to perform their work The appropriate use, protection and sharing of personal information is significant to acting professionally and ethically Prevention and education strategies are central to the proper stewardship of personal information Should a personal information breach occur, OCH must act quickly and transparently to respond and take measures to avoid future incidents
Application	This policy applies to all OCH employees, Board Directors and Committee Members, partners, volunteers, and business invitees.

Organization Organizational Effectiveness	Title/Subject Personal Information and Privacy Policy			
Owner Executive Director Organizational Effectiveness	Approved by Board of Directors	Date January 8, 2015	Version 1.0	Page 2 of 9

Personal Information and Privacy Policy

Roles & Responsibilities

Key Roles	Key Responsibilities
CEO, Executive Directors, Directors	<p>Ensure</p> <ul style="list-style-type: none"> Policy and procedures for personal information management and privacy are enforced within the Corporation An OCH Privacy Officer is appointed to oversee and ensure legislative compliance related to personal information management and privacy All employees are appropriately trained and supervised in collecting, using, protecting and disclosing personal information annually and as operational needs require Privacy protection requirements are included in the design of all new business processes, projects and technology Personal information breach protocols are established and reviewed with employees Actual or potential personal information breaches are responded to promptly by reporting to the Privacy Officer Appropriate corrective action for violations of this policy Details in Personal Information Databanks are accurate and updated as changes occur Board and Committee members and business invitees are briefed on their responsibilities to comply with the policy
Human Resources	<ul style="list-style-type: none"> Ensure new employees and volunteers are provided with initial training on collecting, using, protecting and disclosing personal information Ensure all employees receive regular training on personal information protection and privacy

Organization Organizational Effectiveness	Title/Subject Personal Information and Privacy Policy			
Owner Executive Director Organizational Effectiveness	Approved by Board of Directors	Date January 8, 2015	Version 1.0	Page 3 of 9

Personal Information and Privacy Policy

Managers and Supervisors	<ul style="list-style-type: none"> Provide supervision and guidance to employees in understanding and complying with this policy and applicable OCH procedures and directives Discuss this policy with employees and highlight any of the areas or examples that have particular relevance, given the nature of the employee's work Report actual or potential personal information breaches to the appropriate Executive Director, Director and the Privacy Officer promptly
Employees	<ul style="list-style-type: none"> Comply with this policy and applicable OCH procedures and directives Ask an Executive Director, Director, Manager or Supervisor questions if uncertain about how to apply this policy and applicable OCH procedures and directives Take every precaution reasonable in the circumstances for the protection of Personal Information Promptly report to an Executive Director, Director, Manager or Supervisor any actual or potential personal information breaches of this policy
Business Invitees	<ul style="list-style-type: none"> Comply with this policy and the related clauses in contracts with OCH (where applicable)
Privacy Officer	<ul style="list-style-type: none"> Review OCH's policies and practices with regard to personal information Ensure that the collection and retrieval of personal information complies with applicable legislation and OCH's policy Administer all requests for Access to Information in OCH's custody

Organization Organizational Effectiveness	Title/Subject Personal Information and Privacy Policy			
Owner Executive Director Organizational Effectiveness	Approved by Board of Directors	Date January 8, 2015	Version 1.0	Page 4 of 9

Personal Information and Privacy Policy

	<ul style="list-style-type: none"> Investigate and respond to individuals who file complaints regarding the collection, use and disclosure of personal information in accordance with legislated requirements Coordinate the process for responding to a report of a personal information breach Submit an Annual Report to the Information and Privacy Commissioner Maintain Personal Information Data Banks based on detail provided by Executive Directors and Directors Answer questions related to collection, use, disclosure, safeguarding personal information Guide OCH employees in carrying out their duties in relation to this policy Develop orientation and learning material and activities related to personal information and privacy
Related OCH Policies and Procedures	<p>Related OCH Policies and Procedures include:</p> <ul style="list-style-type: none"> Guide to Personal Information and Privacy Access to Information Procedure Personal Information Breach Procedure Information Retention Procedure and Schedule
Other Supporting References	<p>References include</p> <ul style="list-style-type: none"> <i>Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)</i> <i>Housing Services Act (HSA)</i>
Questions / Contact	Executive Director Organizational Effectiveness

Organization Organizational Effectiveness	Title/Subject Personal Information and Privacy Policy			
Owner Executive Director Organizational Effectiveness	Approved by Board of Directors	Date January 8, 2015	Version 1.0	Page 5 of 9

Personal Information and Privacy Policy

Appendices	<p>Appendix 1 – Definitions</p> <p>Appendix 2 – Document History</p>
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Organization Organizational Effectiveness	Title/Subject Personal Information and Privacy Policy			
Owner Executive Director Organizational Effectiveness	Approved by Board of Directors	Date January 8, 2015	Version 1.0	Page 6 of 9

Personal Information and Privacy Policy

Appendix 1 – Definitions

Term	Acronym	Definition
Board Directors and Committee members		All members of OCH’s Board of Directors and Committees
Business invitee		Vendors, contractors or other providers of goods and services to OCH tenants or OCH. Community organizations that have a relationship with OCH are also considered business invitees
Privacy breach		An incident involving unauthorized disclosure of personal information in OCH’s custody and control
Employees		Full-time, part-time, temporary or casual workers, students and volunteers
<i>Housing Services Act</i>	HSA	Provincial legislation which governs the collection, use, and disclosure of personal information in the provision of social housing in Ontario
<i>Municipal Freedom of Information and Protection of Privacy Act</i>	MFIPPA	Provincial legislation which controls the collection, use, disclosure and destruction of personal information held by Ontario municipalities and certain designated organizations, such as OCH
Personal information		<p>Personal information is broadly defined as anything which identifies an individual. More specifically, personal information is:</p> <ul style="list-style-type: none"> • The personal address, telephone number or email address of an individual • Any identifying number assigned to an individual which can lead to that person's identification such as a Tenant Identification Number, Social Insurance Number, or employee number • Information about an individual’s income and assets • Bank account and credit card information • Information relating to the race, national or ethnic origin, citizenship status; colour, religion, age, sex,

Organization Organizational Effectiveness	Title/Subject Personal Information and Privacy Policy			
Owner Executive Director Organizational Effectiveness	Approved by Board of Directors	Date January 8, 2015	Version 1.0	Page 7 of 9

Personal Information and Privacy Policy

<p>Privacy Officer</p>		<p>sexual orientation, marital or family status of an individual</p> <ul style="list-style-type: none"> Information relating to the education, medical, psychiatric, psychological, criminal or employment history of the individual Credit and rental history reports Financial information for the purposes of establishing Rent-Geared-to-Income assistance An individual's blood type or fingerprints Information about an individual's personal or political opinions Correspondence sent to OCH that is of a private or confidential nature; and any replies from OCH that would reveal contents of the original correspondence An individual's name if it appears with other confidential information (e.g. rent arrears reports) Employee information including résumés, salary and benefits, disciplinary action, bank account information, tenant complaints about an individual, and problems between staff <p>Personal information does NOT include the name, position and business phone number of employees</p> <p>The Privacy Officer is responsible for OCH's compliance with all privacy legislation. The Privacy Officer will be designated by the Board of Directors.</p>
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Organization Organizational Effectiveness	Title/Subject Personal Information and Privacy Policy			
Owner Executive Director Organizational Effectiveness	Approved by Board of Directors	Date January 8, 2015	Version 1.0	Page 8 of 9

Personal Information and Privacy Policy

Appendix 2 – Document History

Revision Number	Date	Author(s)	Brief Description of Change
0.1	2005-02-10	Hastings, Kelly	Original Privacy Policy
0.2	2014-09-17	Hastings, Kelly	Updated to comply with current policy standards
0.3	2014-10-03	Hastings, Kelly	Updated based on workgroup feedback
0.4	2014-10-10	Hastings, Kelly	Updated based on review with Director, Performance and Quality
1.0	2014-10-31	Hastings, Kelly	Modified to clarify roles and responsibilities

Organization Organizational Effectiveness		Title/Subject Personal Information and Privacy Policy		
Owner Executive Director Organizational Effectiveness	Approved by Board of Directors	Date January 8, 2015	Version 1.0	Page 9 of 9