

Personal Information and Privacy Policy

Effective Date	November 15, 2023
Approval Date	November 15, 2023
Next Review Date	November 2028

Policy Statement	<p>OCHC collects and uses the personal information of its tenants, employees and business invitees to perform its work. This information is private and OCHC commits to respecting privacy by safeguarding the information for the period in which it is in OCHC possession and disclosing it only when it is legally appropriate to do so.</p> <p>OCHC 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	<ul style="list-style-type: none"> Chief Officers and Vice Presidents are responsible for personal information management and privacy within the corporation An OCHC 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
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 OCHC 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

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	<ul style="list-style-type: none"> • Prevention and education strategies are central to the proper stewardship of personal information • Should a personal information breach occur, OCHC must act quickly and transparently to respond and take measures to avoid future incidents
Application	This policy applies to all OCHC employees, Board Directors and Committee Members, partners, volunteers, and business invitees.

Roles and Responsibilities

Key Roles	Key Responsibilities
Chief Executive Officer, Chief Officers, Vice Presidents	<ul style="list-style-type: none"> • Ensure policy and procedures for personal information management and privacy are enforced within the Corporation • An OCHC 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
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 • All employees are appropriately trained and supervised in collecting, using, protecting and disclosing personal information annually and as operational needs require

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	<ul style="list-style-type: none"> • 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
Managers	<ul style="list-style-type: none"> • Provide supervision and guidance to employees in understanding and complying with this policy and applicable OCHC procedures and directives • Discuss this policy with employees and highlight any of the areas or examples that have relevance, given the nature of the employee's work • Report actual or potential personal information breaches to the appropriate Executive Director Chief Officer, Vice President, and the Privacy Officer promptly
Employees	<ul style="list-style-type: none"> • Comply with this policy and applicable OCHC procedures and directives • Ask a Chief Executive Officer, Vice President, Director, or Manager questions if uncertain about how to apply this policy and applicable OCHC procedures and directives • Take every precaution reasonable in the circumstances for the protection of Personal Information • Promptly report to a Chief Officer, Vice President, Director, or Manager 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 OCHC (where applicable)
Privacy Officer	<ul style="list-style-type: none"> • Review OCHC's policies and practices regarding personal information • Ensure that the collection and retrieval of personal information complies with applicable legislation and OCHC's policy

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	<ul style="list-style-type: none"> Administer all requests for Access to Information in OCHC's custody 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 Chief Officers or Vice Presidents Answer questions related to collection, use, disclosure, safeguarding personal information Guide OCHC employees in carrying out their duties in relation to this policy Develop orientation and learning material and activities related to personal information and privacy
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Related OCHC Policies and Procedures	<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	<ul style="list-style-type: none"> Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) Housing Services Act (HSA)
Questions / Contact	Director, Legal Services

Appendices	<p>Appendix 1 – Definitions</p> <p>Appendix 2 – Document History</p>
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Appendix 1 – Definitions

Term	Definition
Board Directors and Committee members	All members of OCHC's Board of Directors and Committees
Business invitee	Vendors, contractors or other providers of goods and services to OCHC tenants or OCHC. Community organizations that have a relationship with OCHC are also considered business invitees
Privacy breach	An incident involving unauthorized disclosure of personal information in OCHC's custody and control
Employees	Full-time, part-time, temporary or casual workers, students and volunteers
<i>Housing Services Act</i>	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>	Provincial legislation which controls the collection, use, disclosure and destruction of personal information held by Ontario municipalities and certain designated organizations, such as OCHC
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, sexual orientation, marital or family status of an individual • Information relating to the education, medical, psychiatric, psychological, criminal or employment history of the individual • Credit and rental history reports

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	<ul style="list-style-type: none"> • 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 OCHC that is of a private or confidential nature; and any replies from OCHC 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 • Personal information does NOT include the name, position and business phone number of employees
Privacy Officer	The Privacy Officer is responsible for OCHC's compliance with all privacy legislation. The Privacy Officer will be designated by the Board of Directors.

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Appendix 2 – Document History

Revision Number	Date	Author(s)	Brief Description of Change
1.0	2005-02-10	Kelly Hastings	Approved by the Board of Directors
2.0	2015-01-08	Kelly Hastings	Approved by the Board of Directors
2.1	2022-12-22	Kelly Hastings	Titles updated in Roles and Responsibilities
2.2	2023-09-05	Kelly Hastings	Updated titles and role changes

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