PRIVACY AND CONFIDENTIALITY POLICY AND PROCEDURE			
Section:	HUMAN RESOURCES- PERSONNEL POLICIES	Policy No.	3.2.6
Title:	PRIVACY AND CONFIDENTIALITY	Date of Last Revision	May, 2023
Issue to:	All EMPLOYEES, VOLUNTEERS AND MEMBERS OF THE BOARD	Effective Date	March,2023
		Annual Review Required	NO
Issued by:	WOPC	Date of Last Review	September2023

# PRIVACY AND CONFIDENTIALITY POLICY AND PROCEDURE

# **POLICY**

West Oakville Preschool Centre (the "Centre") is committed to protecting the privacy of children, staff, volunteers and students.

## 1. PURPOSE

The purpose of this Policy is to ensure privacy and confidentiality of all parties at West Oakville Preschool Centre.

## 2. SCOPE

West Oakville Preschool Centre is committed to protecting the privacy and confidentiality of personal information with regards to the children, families, employees, students, volunteers, Board members and professional partners that are involved with the centre.

#### 3. RESPONSIBILITY

It is expected, as a condition of employment, placement, or engagement, that all personal information that an individual becomes privy to, while employed, placed or engaged at West Oakville Preschool Centre, is kept in *strict confidence*, both during and after employment, placement or engagement with the centre.

Privileged information that may be inadvertently shared or overheard must be respected and kept confidential. All employees, students, volunteers, parents, members of the Board and professional partners will refrain from:

- Engaging in discussion about clients or confidential business matters either inside or outside of the centre
- The collection and exchange of personal information
- Removing confidential written and electronic material of any kind from the centre

Except when;

- Required to for the purpose of West Oakville Preschool Centre business or program delivery
- Informed and/or written consent has been given
- Express consent of the Executive Director or Board of Directors has been given (where applicable)
- Required by law.

Sharing of personal information may only occur according to the Collection and Exchange of Information Policy and Procedures. (see 3.2.7 Collection and Exchange of Information Policy-Section 3: Human Resources)

The Privacy and Confidentiality Policy will be reviewed with all employees, students, volunteers, members of the Board of Directors, parents and professional partners prior to, and annually thereafter, commencement of employment, placement or engagement with West Oakville Preschool Centre. Any breach of the Privacy and Confidentiality Policy will constitute sufficient grounds for termination of employment, placement or engagement with the Centre.

#### 4. REFERENCES

Freedom of Information and Protection of Privacy Act, R.S.O 1990, c. F.31

## **PROCEDURE**

- 1. The Executive Director/Designate will initiate review of the Privacy Confidentiality Policy with all employees, students, volunteers, members of the Board of Directors, parents/guardians and professional partners as per policy.
- 2. All employees, students and volunteers are required to sign the applicable acknowledgement of initial or annual policy review. (see Appendix 3.1.4 a) Acknowledgment of Initial Policy Review and 3.1.4. b) Acknowledgment of Annual Policy Review)

### 6. RECORD KEEPING

Information concerning a complaint, or action taken as a result of the investigation, will not be released to anyone who is not involved with the investigation unless as required by law. Both the Complainant and Respondent will receive, in writing a report of the investigation findings, and a summary of corrective actions to be enacted, if applicable.

Personal information pertaining to this policy will be kept in accordance with applicable privacy policies and will be kept for a period of 3 years at the end of the period in which they were engaging with WOPC.

## **APPENDICES**

N/A

The Privacy and Confidentiality Policy will be reviewed on an annual basis/as needed, and/or in the event the legislation pertaining to this policy changes.

Per compliance reporting any exceptions to this policy shall be reported by the Executive Director to the Board of Directors on a monthly basis.