

## Privacy Code

The Island Work Transitions Privacy Code is built on the ten principles of the Canadian Standards Association (CSA) Model Code for the protection of Personal Information which was published in March 1996 as a National Standard of Canada, and is now incorporated into both federal and provincial laws.

### 5.2.1 Definitions

*“Contact information”* means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.

*“Employee personal information”* means personal information about an individual that is collected, used or disclosed solely for the purposes reasonably required to establish, manage or terminate an employment relationship between the organization and that individual, but does not include personal information that is not about an individual’s employment.

*“Organization”* means a person, an unincorporated association, a trade union, a trust or a not for profit organization, but does not include:

- a) an individual acting in a personal or domestic capacity or acting as an employee;
- b) a public body;
- c) the Provincial Court, the Supreme Court of the Court of Appeal;
- d) private trust for the benefit of one or more designated individuals who are friends or members of the family of the settler.

*“Personal information”* means information about an identifiable individual and includes employee personal information but does not include contact information or work product information.

*“Company”* means Island Work Transitions and Associates Inc. (Island Work Transitions)

### 5.2.2 Introduction

Island Work Transitions is a leading government contractor of employment services. Therefore, privacy of personal information is a critical priority. This Privacy Code is intended to set out the Company’s commitment to clients and employees regarding the protection of client and employee personal information as reflected in the following principles, policies and procedures. It is also intended to set out the choices available for individuals regarding the collection, use or disclosure of their personal information.

The purpose of this Privacy Code is to articulate clearly privacy practices respecting the use of personal information collected and used by our Company and to ensure compliance with the federal and provincial privacy laws. It is the intention of this Privacy Code to recognize the needs of the Company to collect, use or disclose personal information versus the right of individuals to protect their personal information. The standard for the collection of personal information by the Company is one of what a reasonable person would consider appropriate in the circumstances.

Island Work Transitions is further committed to a continual review and updating of this Privacy Code to ensure that it keeps pace with changes in technology and industry practices and meets the on-going needs of employees, contractors and clients.

### 5.2.3 Guiding Principles

The following ten principles are the basis of the Island Work Transitions Privacy Code and shall guide the Company’s use of personal information and its privacy practices, together with the statutory requirements of the BC *Personal Information Protection Act*.

#### 1. Accountability

Island Work Transitions is accountable for all personal information under its control. Island Work

Transitions' PRIVACY OFFICER is Managing Director, **Aaron Clausen**. Any questions about the Company's handling of personal information should be directed to the Privacy Officer.

## **2. Purpose of Personal Information**

The purpose for which the Company collects personal information will be identified at or before the time the information is collected. The Company collects personal information about its clients in order to:

- manage and administer the employment counselling or business consulting relationship, and,
- to comply with provincial or federal requirements, regulations and policies regarding client participation in employment services or programs, and/or referral to alternative agencies for service.

The Company also collects a certain amount of personal information about its employees in order to:

- manage and administer the employment relationships, and,
- comply with legal and regulatory requirements.

All personal information about clients and employees is protected through appropriate security safeguards, by keeping information accurate and up-to-date, and by responding to client and employee requests. The Company will not sell, share, transfer and/or otherwise use personal information for any other purpose than identified and authorized by the client or employee at or before the time of collection.

## **3. Consent**

Island Work Transitions seeks consent for all personal information collected, used and disclosed through information provided to individuals prior to collection, or at the time of collection. Clients consent to their personal information being disclosed to the government agency that funds the program they are participating in through signed consent.

If information was voluntarily provided, it is assumed that the employee has consented to the collection, use and disclosure of this personally identifiable information as described in this privacy policy. As required by the CSA Model Code, the Company will not use personal information for any purpose other than that for which the Employee consented. Should the Company require personal information for a new purpose, the Employer will contact the Employee to seek consent for that new use.

## **4. Limiting Collection of Personal Information**

Island Work Transitions does not collect personal information of individuals except when individuals give consent and provide the information on a voluntary basis. There may be occasions where more specific personal information is necessary for the Company to proceed with a request for information, or provide a product or service to employees.

In such cases, the Company will provide a description of the information required to the individual in question. In all cases, the Company limits the amount and type of information collected to only the personal information that is required to provide the requested information, product, or service. Only information that is authorized by the employee is collected and this information will be kept strictly confidential.

## **5. Limiting Use, Disclosure and Retention of Personal Information**

Island Work Transitions does not use or disclose personal information of individuals except when individuals give consent, or as provided by law. Personal information is retained only as long as is necessary to provide individuals with the requested product, service or information and the information is deleted or destroyed after that time.

Personal information on clients will only be used for the period that a file is active plus one year and will then be deleted or destroyed. In some cases, however, legal reporting and retention

requirements necessitate that the Company retain information for a specific amount of time, or return the information to the government agency, for which the Company is delivering service. In general, the Company retains information for a period not longer than one (1) year beyond file closure.

#### **6. Accuracy of Personal Information**

Island Work Transitions makes every effort to keep personal information as accurate, complete, current and relevant as necessary for the identified purposes.

#### **7. Safeguarding Personal Information**

Island Work Transitions respects the privacy of our clients, partners, potential website visitors and internet users and will protect that privacy as vigorously as possible. Personal information is stored in electronic and physical files that are secure. Security measures include:

- Employee confidentiality agreements are in place that are renewed on an annual basis, concurrent with training on privacy and security issues.
- Access controls, so only those employees of the contractor with a “need to know” can obtain access to personal information of clients.
- Physical files are kept in locked metal file cabinets.
- After the maximum retention period expires, the file is shredded and the paper recycled.

Electronic files exist and are protected as follows:

- Encryption is employed on all devices where personal and sensitive information is stored.
- Use of passwords, firewalls and anti-virus software.
- Restriction of access to records and equipment to specific, designated employees.
- Removal of data when no longer required.
- Access controls on who puts information into the system and who removes it.
- Audit trails of all accesses to personal information that provide more than an after-the-fact record of these transactions (ideally, the system would prevent unauthorized persons from accessing the system in the first instance).

Unfortunately, in the case of email or fax, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while Island Work Transitions strives to protect all personal information, the security of any information transmitted to Island Work Transitions cannot be insured.

#### **8. Openness Concerning Policies and Practices**

Island Work Transitions ensures that information is made available to employees and clients regarding this Privacy Code and privacy practices regarding personal information.

#### **9. Client and Employee Access to Access to Personal Information**

Island Work Transitions provides access to the Privacy Policy and related procedures to individuals on the Company’s website and in written form to any requester. Any questions about the handling of personal information by the Company can be raised with the Privacy Officer.

#### **10. Challenging Compliance**

At the written request of an individual, he or she may view or edit their personal information as collected by the Company. The Company will inform the requester of the nature of personal information about the individual, what it is being used for and, in cases where it has been disclosed, to whom it has been disclosed. There may be exceptional circumstances as provided by the CSA Model Code under which the Privacy Officer may not be able to give an individual access to the personal information held by the Company. In this case the Privacy Officer will explain the reason for this lack of access, as provided by the CSA Model Code.

The Privacy Officer will reply to a request for information in no later than thirty days after receipt of the request, or if not able to respond within this time period, a notice of extension will be sent. If

all the personal information held on an individual can not be disclosed, a reason will be given for the inability to do so, unless prohibited by law.

The Island Work Transitions Privacy Officer is the Director of Administration and Systems and can be reached at:

4805B Mar Street, Port Alberni, BC V9Y 8J5  
Phone: (250) 724-4560 Ext. 235