



BOARD POLICY

2.17 Privacy

Purpose

To set out the privacy policy and provide guidelines for its implementation.

Policy

Whenever a commercial activity is undertaken, Sage shall follow government legislation protecting consumer/donor rights as defined by the Personal Information Protection Act. (PIPA).

Sage shall comply with Canada's anti-spam legislation (CASL) when communicating electronically (e.g. by email).

Names of persons gathered shall be used only for the purpose that was originally intended. Clients/members/donors shall be given the opportunity to agree or disagree to having their names used for anything other than the original intent.

Confidentiality

All staff, volunteers, and Directors shall sign an Oath of Confidentiality while working with Sage.

Disclosure

When collecting information from individuals Sage shall advise each person that:

"Sage now collects personal information in a digital (electronic) form in order to:

- Evaluate program effectiveness
- Accurately and quickly determine program trends and
- Report statistics to third parties, for example, funders. In this case individuals are not identified

Established:	June, 2004	Approved By:	Board
Latest Revision:	November, 2016	Implementation	Administration
Next Review:	November, 2021	Authority:	

If you do not want to give us your personal information for any reason you have the right to refuse to, however, this may result in Sage's inability to provide you with services." A United States based company, which must adhere to Sage's privacy policy, provides the software and data storage used to collect, transfer, and process personal information. All information is held in a firewall and password protected server located in Ontario. The company is subject to the laws of both Canada and the United States of America, so your personal information could be disclosed if either country lawfully requires it.

Freedom of Information and Protection of Privacy Act (FOIP)

The fundamental principles of FOIP are:

To allow a right of access to any person to the records in the custody or control of a public body subject to limited and specific exceptions,

To control the manner in which a public body may collect personal information from individual Albertans; to control the use that a public body may make of that information; and to control the disclosure by a public body of that information,

To allow individuals, subject to limited and specific exceptions, the right to have access to information about themselves which is held by a public body,

To allow individuals the right to request corrections to personal information about themselves held by a public body,

To provide an independent review of decisions made by a public body under the legislation.

Collection of Information

All personal information collected shall relate directly to and be necessary for services provided to the client/member by Sage.

All documentation information shall be signed off by the person collecting the information. The job title of that individual shall follow the name.

Sage shall have procedures in place outlining file documentation procedures.

Security of Information

Electronic files saved on the agency server shall be both password and firewall protected. Additionally, sensitive files (for example electronic personnel files) shall be accessed only by staff with authority.

Retention of Files

Electronic client databases used by agency programs may be housed on secure servers off-site. The administration of databases within the agency shall be limited to two staff members, and staff access to individual Sage programs shall be restricted to the specific job requirements of each staff member.

Paper files kept by agency staff shall be secured in a locked filing cabinet in each staff member's office. All staff offices shall be locked when the employee is not present.

Sage shall retain personal information for 10 years.

Disposal of Files

All hard copies of personal information shall be culled and shredded every 10 years. All personal information contained in electronic format shall be deleted every 10 years. When a server under the control of Sage is decommissioned it shall be removed and physically destroyed.

Access

A person making a request for their personal information shall sign a release of information for this purpose.

When Sage receives a written request for information that makes the request specifically under FOIP legislation, the Request for Information Procedure shall be followed.

Clients/members shall be made aware of third party requests for information. Informed consent must be obtained to release this information, except when prohibited by law (e.g. subpoena).

Controls in Use

Personal information collected shall only be shared with another program of Sage with consent of the concerned individual.

Information may only be used for other purposes and shared with other organizations with written consent from the concerned individual.

File Documentation

Individual files are legal documents and may be governed under the Freedom of Information and Privacy Act (FOIP).

Documentation in a client file may include:

Services, resources offered, referrals made.
Progress made and identified with the client around the case plan.
Observations, changes in behavior and concerns identified by staff.

File documentation will not include judgmental or diagnostic comments.

For paper files

Each entry will be dated and signed by the writer, including the job title.

For electronic files

Each entry will be dated with the name and the job title of the documenter indicated.

Sage's electronic communications and commerce (e-store) will comply with Canada's Anti-Spam Legislation (CASL), which generally prohibits the:

- sending of commercial electronic messages without the recipient's consent (permission), including messages to email addresses and social networking accounts, and text messages sent to a cell phone;
- alteration of transmission data in an electronic message which results in the message being delivered to a different destination without express consent;
- installation of computer programs without the express consent of the owner of the computer system or its agent, such as an authorized employee;
- use of false or misleading representations online in the promotion of products or services;
- collection of personal information through accessing a computer system in violation of federal law (e.g. the *Criminal Code of Canada*); and
- collection of electronic addresses by the use of computer programs or the use of such addresses, without permission (address harvesting).

Request for Information Procedure:

All persons who request information about themselves from their files will sign a release of information indicating their name, date of birth, address and telephone number (if available). Two pieces of identification must be provided to verify the information received.

When a written request for file information is received by Sage under FOIP legislation the following procedure shall be followed:

Contact the individual the request is made of and determine if the information can be released informally by Sage. If he/she is in agreement, he/she must sign a release of information indicating her/his name, date of birth, address and phone number (if available). Two pieces of identification must be provided to ensure the release is being signed by the correct individual.

Sharing of Personal Information

Sage will not exchange, rent, or otherwise share personal information provided by clients, members or donors.

Complaints

Complaints from individuals who are not satisfied with the Sage's response for access should be referred to:

Office of the Information and Privacy Commissioner of Alberta
410, 9925 104 St
Edmonton, AB T5J 2J8
Phone: (780) 422-6860
Fax: (780) 422-5682