



Privacy Policy

OPERATIONAL POLICY: Privacy	POLICY NUMBER:	
ORIGINAL DATE OF ISSUE: April 2007	DATE OF REVISION: February 17, 2016	# OF PAGES 5
SCOPE: AFCS has developed the following Privacy Policy in order to ensure compliance with PIPEDA, as well as to inform individuals of our continuing commitment to the protection of their personal information.		
APPLIES TO: All employees, independent contractors, students and volunteers		

Andrew Fleck Children's Services (AFCS) has always been committed to the protection of the personal information of its clients, partners and other stakeholders. On January 1, 2004, the Federal Personal Information Protection and Electronic Documents Act (PIPEDA) began to apply to provincially regulated organizations that collect, use and disclose personal information in the course of commercial activity. AFCS has developed the following Privacy Policy in order to ensure compliance with PIPEDA, as well as to inform individuals of our continuing commitment to the protection of their personal information.

What is personal information?

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. **Information includes written records, as well as photos and videos of children.** This includes information in any form such as a person's e-mail address, food allergies, person's age, home address and so on. It does not include the name, title or business address or business telephone number of an employee of an organization.

Who is responsible for protecting the personal information collected, used and disclosed by AFCS?

The Executive Director of AFCS is the Privacy Officer for the organization and is responsible for ensuring compliance with PIPEDA and with this Privacy Policy. Other individuals, such as Program Managers and certain staff may be delegated to either act on behalf of the Privacy Officer or to take responsibility for occasional collection, use and disclosure of personal information.

Privacy Policy

Why does AFCS collect or use personal information?

Information collected should be the minimum needed to serve the purpose of the service AFCS provides. AFCS is committed to providing quality, dependable and inclusive child care, support and information services to meet the diverse child care and early years needs of families and children. In order to meet these goals, AFCS collects, uses and discloses personal information for the following purposes:

Provision of services

- To determine eligibility for our programs and services.
- To assess the needs of each child and to ensure that these needs are met.
- To ensure the health and safety of all children who participate in our programs and services.
- To identify the children and their families ("clients") who use the services of AFCS.
- To ensure we communicate with the appropriate parent/guardian for each child in our care.
- To aid in the placement of children in our Home Child Care program.
- To promote new and existing programs and services to our clients.
- To assist Children's Inclusion Support Services (CISS) in determining the level of support that may be provided to eligible children.
- To develop, implement and monitor plans to meet the needs of children eligible for the services of CISS.
- To provide families with information and referrals to community support services in Ottawa.
- To ensure timely communication between parents/guardians, caregivers, child care community partners, referring agencies and AFCS staff.

Administration

- To administer our programs and services (e.g. time sheets, attendance reports, etc.).
- To collect payment for services provided.
- To ascertain the qualifications and suitability of applicants to provide child care.
- To facilitate the recruitment of Program Assistants for children with special needs.
- To ascertain the qualifications and suitability of volunteer applicants.
- To distribute limited municipal subsidies for children with disabilities.

Reporting

- To generate statistics on services and programs provided by the Agency.
- To generate statistics on the child care needs of families in Ottawa.
- To report use of child care subsidies to the City of Ottawa.

Privacy Policy

Other

- To periodically undertake fundraising activities to enhance programs and services for children and families.
- To meet statutory, regulatory and contractual requirements relating to the services and programs provided to our clients.

Does AFCS disclose personal information?

We disclose personal information:

- To caregivers in our Home Child Care program to enable them to provide services to the children in their care, to ensure the health and safety of those children, with parental consent.
- To child care programs working with Children's Inclusion Support Services to develop individual support plans and team service plans for eligible children, with parental consent.
- To institutions providing the Agency with payroll and banking services.
- To our auditors, and
- To third parties for processing of data (e.g. hardware and software support).

AFCS requires written consent of a parent or guardian prior to the release of personally identifiable information to third parties. This includes the release of any information through social media (see Social Media Policy). AFCS will not release any third party information held in the child's file.

Unless required to do so by law, AFCS does not currently disclose the personal information under its control to any other parties. It does not trade, sell, barter, or give away its client information to anyone. Should it be necessary in the future to make such a disclosure, AFCS will not do so without the express consent of the individuals involved.

How do individuals provide AFCS with their consent for the collection, use and disclosure of their personal information?

When families seek the services of AFCS they provide their personal information expressly through a registration/referral process. AFCS then has access only to the personal information provided by the client that is required to fulfill the purposes stated above. A client may withdraw their consent at any time upon reasonable notice, subject to legal or contractual restrictions. Please note however, that due to our statutory and regulatory obligations withdrawing consent may affect our ability to continue to provide a client with the services they have or would like to receive.



Privacy Policy

How much personal information does AFCS collect, use or disclose?

AFCS collects, uses and discloses the personal information it requires only in order to fulfill the purposes listed above, and no more.

How long does AFCS retain personal information?

AFCS only retains personal information for as long as is required to fulfill the purposes listed above. For example, the Child Care and Early Years Act stipulates that we keep a child's file for two years after they have been discharged from a child care program. However, many of our programs retain information longer than this two year period (for example, programs where children may use the service more than once). The Canada Revenue Agency requires us to keep financial records (e.g. child care billings) for six years plus the current year.

How accurate is the personal information collected, used and disclosed by AFCS?

AFCS makes every effort to ensure the personal information it collects, uses and discloses is as accurate and up-to-date as is required to fulfill the purposes listed above. If an individual's personal information requires amendment, they need only contact AFCS to ensure that the correction is made. When a file is no longer needed it is either destroyed or all personal identifiers are removed in such a way as to prevent accidental disclosure.

How secure is the personal information stored at AFCS?

AFCS is committed to ensuring that personal information is protected from unauthorized access, unintended disclosures or theft. This protection is provided by firewalls in the computer system, passwords to protect databases, encrypted e-mail, locked filing cabinets and limited access to certain work areas. Only the Privacy Officer and delegated individuals have access to this information.



Privacy Policy

How can individuals learn more about AFCS's Privacy Policy?

Updated versions of this Privacy Policy will be posted on the AFCS web site at www.afchildcare.on.ca. This Policy is also available in hard-copy at the AFCS administration office, a copy of which can be requested by contacting AFCS at:

Andrew Fleck Children's Services 700 Industrial Ave., Suite 600 Ottawa, ON K1G 0Y9

Phone: 613-736-5355

Fax: 613-736-8378

E-mail: admin@afchildrensservices.ca

How can individuals access their personal information held by AFCS?

Parents are informed in the Parent Manual/Client Handbook or other means how they can access their child's records and who has access to the information. Individuals have a right to access their own personal information in the possession and control of AFCS. They also have a right to know if their information has been disclosed to any third parties. If individuals wish to access their personal information, they need to contact AFCS in writing at the above mailing or e-mail address. AFCS reserves the right to charge a reasonable fee for the copying of this information.

How can individuals relay their concerns about their personal information held by AFCS?

If individuals have a complaint related to the AFCS Privacy Policy, they can contact the Privacy Officer using any of the above contact information. If the Privacy Officer is unable to resolve the concern, individuals can contact the Privacy Commissioner of Canada at www.privcom.gc.ca or at:

112 Kent Street Ottawa, ON K1A 1H3

Tel: 613-995-8210

Toll free: 1-800-282-1376

Fax: 613-947-6850

Approved by the Andrew Fleck Children's Services Board of Directors on March 24, 2004 – Updated June 2014