PRIVACY POLICY

Our Commitment to Privacy

Protecting the privacy and confidentiality of personal information is an important aspect of the way Family Service Kent conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to daily operations.

Family Service Kent strives to protect and respect personal information of its clients, personnel, and business partners ~~in~~ accordance with all applicable regional and federal laws. Each personnel member of Family Service Kent must abide by this organization's procedures and practices when handling personal information.

Applicability

This Privacy Policy informs everyone of Family Service Kent's commitment to privacy and establishes the methods by which privacy is ensured. This Privacy Policy applies to all personal information within the agency's possession and control.

Personal information is defined as any identifying information about an individual or group of individuals, including name, date of birth, address, phone number, e-mail address, social insurance/security number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

Business information is defined as business name, business address, and business telephone number, name of owner, Executive Director, agency personnel, job titles, business registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

Consent occurs and is obtained when an individual signs an application or other form containing personal information, thereby authorizing Family Service Kent to collect, use, and disclose the individual's personal information for the purposes stated on the form or in the Appropriate Use section of this policy.

Clients who choose to withdraw their consent, withhold consent, or place limits on the use of their personal information will be informed of implications for service, for example limits to treatment, loss of third party funding.

Appropriate Use

Family Service Kent collects and uses personal information solely for the purpose of conducting business and developing an understanding of its clients. Family Service Kent hereby asserts that personal information will only be used for the purposes for which the information was provided (except where permitted or required by law - see policy statement # 8).

Policy Statements

1. Family Service Kent assumes full accountability for the personal information within its possession and control. The organization has appointed **Allison Eaton,** *Manager of Clinical Services*, as custodian of all privacy matters and legal compliance with privacy laws.

2. Family Service Kent obtains personal information directly from the individual to which the information belongs. Individuals are entitled to know how Family Service Kent uses personal information and this

organization will limit the use of any personal information collected only to what is needed for those stated purposes. Should it be needed, consent will be obtained from a substitute decision-maker.

3. Under no circumstances will Family Service Kent sell, distribute, or otherwise disclose personal information or contact lists to third parties. However, limited disclosure within the agency may be required as part of Family Service Kent fulfilling its stated business duties and day-to-day operations. In all circumstances except where permitted or required by law, client consent will be required for the use and release of personal information for themselves or third party requests.

4. Family Service Kent will retain personal information only for the duration it is needed for conducting business. Once personal information is no longer required, it will be destroyed in a safe and secure manner. Should certain laws require that personal information be kept for a specified amount of time, the law will supersede this policy.

5. Family Service Kent will protect personal information with the appropriate security measures, physical safeguards, and electronic precautions. Family Service Kent maintains personal information through a combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, offsite location.
    - Access to personal information will be authorized only for personnel of Family Service Kent who require the information to perform their job duties, and to those otherwise authorized by law.
    - Family Service Kent's computer and network systems are secured by complex passwords. Only authorized individuals may access secure systems and databases.
    - Active files are kept in locked filing cabinets.
    - Routers and servers connected to the Internet are protected by a firewall, and are further protected by virus attacks or "snooping" by sufficient software solutions.

6. Family Service Kent's Web site will include the privacy policy and disclose the personal information practices. Individuals inputting data into the Web site will be notified of:
    - Personally identifiable information about the individual that is collected from the Web site or through affiliate sites.
    - Information about the organization collecting the data.
    - How the data will be used.
    - With whom the data may or may not be disclosed.
    - The information technology security procedures in place that protect against the destruction, loss, theft, alteration, or misuse of personal information under Family Service Kent's possession and control.
    - If the website contains links to other sites, Family Service Kent is not responsible for the privacy practices of other organizations' websites.
    - While IP addresses will be logged in order to administer the site, track visitor movement, and gather demographic information, these IP addresses will not be linked to any personally identifiable information.
    - Any registration or order form asking site visitors to enter personal or financial information will be protected by SSL encryption.

7. In most instances, Family Service Kent will grant individuals access to their personal information upon presentation of a written request and satisfactory identification. If an individual finds errors of fact with their personal information, they should notify their worker immediately to make the appropriate corrections. Should Family Service Kent deny an individual's request for access to their personal information, the individual will be advised in writing of the reason for such a refusal. The individual may then challenge the decision.

8. Family Service Kent may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:
    - Family Service Kent is under obligation by law to disclose personal information in order to adhere to the requirements of an investigation of the contravention of a regional or federal statute, under the purview of the appropriate authorities.
    - An emergency exists that threatens an individual's life, health, or personal security
    - The personal information is for in-house statistical study or research.
    - The personal information is already publicly available.

9. In the case of unauthorized theft, loss, or release of their personal information, clients will be notified in writing as soon as possible (see Breach of Confidentiality Letter). Complaints in regards to a breach of privacy will be directed to and be addressed by the Privacy Officer. If a client is not satisfied with the resolution on that level, they may request that the Executive Director review the complaint. If the client is not satisfied with the resolution by the Executive Director they may request that the Board of Directors review the complaint.

Any questions or concerns regarding this Privacy Policy can be addressed by contacting Family Service Kent at (519)-354-6221 or feedback@familyservicekent.com. Family Service Kent will investigate and respond to concerns about any aspect of the handling of personal information.

Office of the Information and Privacy Commissioner of Ontario
Telephone: 416-326-3333
Long Distance: 1-800-387-0073 (within Ontario)
TDD/TTY: 416-325-7539
Fax: 416-325-9195
Email: info@ipc.on.ca
Website: http://www.ipc.on.ca

Office of the Privacy Commissioner of Canada
Telephone: 613-947-1698
Long Distance: 1-800-282-1376
TDD/TTY: 613-992-9190
Fax: 613-947-6850
Email: notification@priv.gc.ca
Website: http://www.priv.gc.ca