

COLLECTION AND EXCHANGE OF INFORMATION POLICY AND PROCEDURE			
Section:	HUMAN RESOURCES - PERSONNEL POLICIES	Policy No.	3.2.7
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COLLECTION AND EXCHANGE OF INFORMATION POLICY AND PROCEDURE

POLICY

West Oakville Preschool Centre (the “Centre”) is committed to protecting the privacy and confidentiality of personal information.

1. PURPOSE

The purpose of this Policy is to ensure that all personal information is protected.

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.

West Oakville Preschool Centre participates in the collection and exchange of personal information in order to meet program delivery needs and regulatory requirements. Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. Prior to the collection of personal information, the reason for, and use of, the information will be clearly communicated to the individual who is being requested to provide the information. *(see appendix a) Notice with Respect to the Collection of Personal Information- WOPC, and b) Notice with Respect to the Collection of Personal Information- Provincial).*

3. RESPONSIBILITIES

Employees, in accordance with the procedure set forth in this policy, are responsible for:

- Review Policy Prior to employment, placement or engagement, and annually thereafter, and sign acknowledge of review
- Ensure passwords/access are not shared with unauthorized individuals
- Ensure storage of all personal information is in confidential manner
- Ensure no information shared electronically is of a personal and/or identifying nature, unless specific written consent is received
- Ensure no conversations/exchange of information of an identifying nature occurs in the

presence of unauthorized individuals

Employers, in accordance with the procedure set forth in this policy, are responsible for:

- Engaging employees, students, volunteers, parents and professional partners in review of this policy, in tandem with the Privacy and Confidentiality Policy
- Collect personal information and consent documents, as per policy, for children, employees, students, volunteers, and professional partners, with informed consent
- Ensure individuals have access only to required information, with consent
- Ensure all personal information is stored in a confidential manner
- Ensures a Notice of Access to Personal Information is kept on file whenever personal information is accessed by non-employees
- Effectively manage non-compliance to policy.
- Ensure that no information shared electronically is of a personal and/or identifying nature, unless specific written consent is received.
- Ensure that no conversations/exchange of information of an identifying nature occurs in the presence of unauthorized individuals

Professional Partners, in accordance with the procedure set forth in this policy, are responsible for:

- Review policy prior to engagement with the centre
- Ensure all personal information is stored in a confidential manner
- Ensure no information shared electronically is of a personal and/or identifying nature, unless specific written consent is received.
- Ensure no conversations/exchange of information of an identifying nature occurs in the presence of unauthorized individuals.

4. REFERENCES

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

PROCEDURE

1. CONFIDENTIALITY

West Oakville Preschool Centre has safeguards in place to protect the privacy and confidentiality of all personal information. All employees, students, volunteers, members of the Board of Directors and professional partners will preview, acknowledge and abide by the centre's Confidentiality Policy (*see 3.2.6 Privacy and Confidentiality Policy- Section 3: Human Resources*)

2. STORAGE OF PERSONAL INFORMATION

All information collected will be stored in a confidential manner, with limited and authorized access

3. INFORMED CONSENT

It is essential that individuals working with children are aware that maintaining confidentiality and obtaining consent prior to sharing information about children is a legal requirement as well as ethical practice. Parents/guardians should be aware that they have the authority to grant permission, or to refuse to grant permission, for the sharing of relevant information regarding their child. Informed consent implies that when an individual gives consent to share information about themselves or their child, they are aware of the following:

- Who the information will be shared with
- What specific information will be shared
- The purpose of sharing the information

- How the information will be used

(See Appendix c) Consent for the Release of Information)

When required by law, there may be instances where employees are required to share information without parent/guardian consent (e.g. duty to report suspected child abuse. police investigations etc.)

4. ACCESS TO PERSONAL INFORMATION

Access to personal information will be made to employees, students, volunteers, members of the Board of Directors and professional partners, based on their authorized level of access to the information required for each individual to engage in their role with West Oakville Preschool Centre.

When personal information is accessed by an individual other than a West Oakville Preschool Centre employee, a Notice of Access to Personal Information will be completed to ensure there is a record of access. The notice will include:

- Name of the individual who the information is being accessed on (child, employee, etc.)
- Date and time information was accessed
- Name, title/designation, and workplace of individual accessing information
- Information accessed and purpose
- Signature of Executive Director/Designate

(See Appendix d) Access of Personal Information Log)

5. CONTRAVENTION

Contravention of this policy could potentially have a negative impact on the individual for which the information was shared, as well as the Centre. Employees will be monitored regularly for compliance and contravention. Any breach of the Collection and Exchange of Information Policy will constitute sufficient ground for termination of employment, placement or engagement with West Oakville Preschool Centre.

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.

This policy, in tandem with the centre's Privacy and Confidentiality Policy, will be reviewed with all employees, students, volunteers, members of the Board of Directors and Community partners prior to the commencement of their employment, placement or engagement with West Oakville Preschool Centre, and annually thereafter, or more often as needed.

Personal information pertaining to this policy, including , but not limited to, criminal record checks and training 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

- a) Notice with Respect to the Collection of Personal Information- WOPC
- b) Notice with Respect to the Collection of Personal Information- Provincial
- c) Consent for the Release of Information
- d) Access of Personal Information Log

The Collection and Exchange of Information Policy will be reviewed as needed 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.



West Oakville
PRESCHOOL CENTRE Inc.