



Ottawa Community Coalition for Literacy

## Privacy Policy

Reviewed and Approved by the Board of Directors  
December 10, 2014

**Next Review Date: December 2017**

### Policy

#### Introduction

The Ottawa Community Coalition for Literacy (OCCL) respects the privacy of the people we work with and serve including adult learners, members, volunteers, employees, donors, sponsors and stakeholders. We are committed to ensuring that appropriate measures and safeguards are in place to protect specific information that is held for the purpose of the program. We adhere to all legislative requirements with respect to privacy.

We do not rent, sell or trade mailing lists. From time to time, other organizations ask for OCCL's help in distributing information that may be of interest to the literacy community. In those cases, OCCL administers the distribution in order to protect the privacy of the people we work with and serve. We do not provide access to our mailing lists.

#### Principles

##### 1. *Accountability*

The Board of Directors has designated OCCL's Executive Director as Privacy Officer to be accountable for our compliance with the principles of this policy and with privacy legislation.

##### 2. *Identifying Purposes*

OCCL will identify the purposes for collecting personal information at the time we ask for it. We will collect personal information only for the following reasons:

- ❖ To understand the needs of the people we serve in order to develop, offer and maintain services that meet those needs
- ❖ To communicate with the people we serve
- ❖ To maintain accurate, up-to-date records
- ❖ To manage and develop our program and operations.

##### 3. *Consent*

OCCL requires the knowledge and consent of the people we work with and serve to collect, use or disclose their personal information. Anyone may withdraw their

consent at any time. However, this may limit OCCL's ability to provide appropriate service and support to them.

#### **4. *Limiting Collection***

OCCL will limit the collection, use and disclosure of personal information to the purposes that we have identified. We will collect information by fair and lawful means.

#### **5. *Limiting Use, Disclosure and Retention***

OCCL will use or disclose personal information only for the purposes for which it was collected, except with an individual's consent or as required by law. We will retain information only as long as necessary to fulfill identified purposes.

#### **6. *Accuracy***

OCCL will keep personal information accurate, complete and up-to-date.

#### **7. *Safeguards***

OCCL will protect personal information with security safeguards appropriate to the sensitivity of the information. Our employees are authorized to access personal information based only on their need to deal with the information for the reason(s) it was obtained.

#### **8. *Openness***

OCCL's privacy policy is readily available to anyone.

#### **9. *Individual Access***

Individuals have the right to know what personal information OCCL has collected, how it is being used and to whom it is being disclosed. Individuals may challenge the accuracy and completeness of their personal information and have it corrected.

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

Individuals may contact the Privacy Officer to access or correct their personal information. They may also ask questions and express concerns or complaints about OCCL's compliance with any of the principles of this policy.

## **Procedures**

### **Learners**

Personal information on learners (names, phone numbers, education) is recorded on a log sheet.

### Procedures

- Staff asks learners for permission to fax information to the Literacy and Basic Skills (LBS) program(s) they are referred to.
- Staff asks learners for permission to share their name and background information by telephone or email with LBS program staff, in order to determine the appropriateness of a referral.
- Staff asks learners for permission to allow the LBS program to contact them.

- Learner telephone log sheets are kept for two years in a binder designated for that purpose and stored out of public view.
- Learner log sheets are shredded before they are discarded.

### **Friends of Literacy**

Personal information on members (home addresses, phone numbers and email addresses) is recorded on a password-protected computer which is accessed only by OCCL's staff.

#### Procedures

- OCCL does not share this personal information with any other individuals or organizations.
- If an individual or organization contacts OCCL asking if they can send information to Friends of Literacy:
  - Our Privacy Officer deems whether the information is appropriate for our members; and, if it is deemed appropriate,
  - Our Privacy Officer, or designated staff, sends the information to members directly from the OCCL office.

### **OCCL Personnel**

OCCL has files containing personal information about staff such as performance appraisals and payroll records.

#### Procedures

- Information that is to be discarded will be shredded first.
- Staff files are kept in a filing cabinet out of public view.

### **Information about the Privacy Policy**

It is important that the public has access to the OCCL Privacy Policy.

#### Procedures

- The policy is posted on the OCCL web site.
- The brochure and membership forms include the following statement:  
*OCCL is collecting this information in order to maintain accurate, up-to-date records so that we can communicate with you. We do not rent, sell or trade mailing lists. OCCL's Privacy Policy is available on our website at [www.occl.ca](http://www.occl.ca).*

### **Revising This or Other OCCL Policies**

OCCL will review and update our privacy policy every two years. We are committed to developing policies that respect and promote the dignity and independence of people with disabilities. No changes will be made to this policy before considering the impact on people with disabilities. Any OCCL policy of that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

### **Contact Information**

Please direct questions, concerns or complaints to our Privacy Officer who will respond within 10 business days.

210-404 McArthur Avenue, Ottawa, Ontario K1K 1G8  
 Phone: 613-233-3232 Fax: 613-241-4170  
 Email: [info@occl.ca](mailto:info@occl.ca) Bell Relay: 1-800-268-9243