



Ottawa Catholic Child Care Corporation

Privacy Policy

The Ottawa Catholic Child Care Corporation (“OCCCC”) is committed to meeting its obligations under the *Personal Information Protection and Electronic Documents Act (PIPEDA)* when it is involved in the collection, use and disclosure of Personal Information for commercial purposes.

For this Policy, **Personal Information** is factual or subjective information, recorded or not. It can include but is not limited to age, name, addresses, e-mail addresses, financial information, identification numbers, income, health information, or opinions. Personal Information may be in verbal, print or electronic form. During our everyday activities, the OCCCC frequently gathers and uses Personal Information from various sources, including parents, guardians, children, family members, and others involved or interested in our work.

The Personal Information that we collect, use or disclose includes such things as your child’s name, home address, contact information for the child’s responsible family members and progress within their program.

This Policy is applied to all Personal Information collected, used or disclosed - whether factual or subjective - about an identifiable individual during commercial activities. The OCCCC will ensure that approved individuals, groups, organizations and businesses designated or contracted to act for, or on its behalf, are aware of and compliant with the principles outlined in this Policy.

The OCCCC adheres to the following privacy principles:

Accountability: The Early Learning Services Manager for OCCCC is responsible for ensuring compliance with this Privacy Policy. The Manager may, from time to time, delegate another individual in the agency to act on her behalf.

Identifying Purposes: The purposes for which the OCCCC collects, uses and discloses Personal Information will be identified at the time or before the information is collected. In general, the OCCCC collects, uses and discloses Personal Information to meet the following purposes:

- To identify clients of OCCCC (children and their parents/guardians)
- To communicate with our clients
- To protect and ensure the health and safety of the children entrusted to our care
- To communicate daily activities of children to parents
- To provide optimal and individualized care for each child
- To monitor the quality of care and the progress of children in care
- To ensure the care provided is flexible and continues to meet the unique needs of each child
- To ensure that the care we provide is respectful of religious and cultural backgrounds
- To meet statutory, regulatory and contractual requirements of the agency

- To provide/send information to prospective clients
- To process applications/requests for care
- To place clients on a waiting list
- To determine eligibility for care and proper placement of your child in a program
- To assist parents in obtaining and maintaining fee subsidies from the City of Ottawa
- To process payments to independent contractors
- To meet the record-keeping obligations required by the provincial Ministry of Education, the City of Ottawa and the Canada Revenue Agency
- To assist Children's Integration Support Services (CISS), when applicable, in determining the level of support that may be provided to eligible children
- To collect payment for services provided
- For the collection of statistics as may be required by our funders
- To administer our programs and services

Subject to the exceptions under PIPEDA, if the OCCCC has already collected Personal Information but wishes to use or disclose it for a new purpose, individuals will be contacted in advance to obtain a current consent for that new purpose.

Consent: Subject to the exceptions under PIPEDA, the knowledge and consent of the individual is obtained for the collection, use, or disclosure of Personal Information, at the time of collection. Consent can be either express or implied. Express consent is given explicitly, either orally or in writing and it is always required when the Personal Information is particularly confidential or sensitive. Implied consent occurs where consent may reasonably be inferred from the action or inaction of the individual (i.e. by filling out a form).

An individual may withdraw their consent at any time upon reasonable notice, subject to legal or contractual restrictions. The OCCCC will advise the individual of the consequences of that withdrawal which, in certain circumstances, could include no longer providing child care services.

Limiting Collection: Collection of Personal Information is limited to that which is necessary for the purposes identified above or for the purposes identified at the time of collection.

Limiting use, disclosure and retention: Personal Information will be used or disclosed only for the purposes for which it was collected except with the individual's consent or as required by law. We do not trade, sell, barter or give away client information to anyone. From time to time the OCCCC discloses Personal Information to the organizations on a "need to know basis" such as the following:

- The City of Ottawa
- Ontario Provincial Government
- To the Licensed Child Care Centres and Licensed Home Child Care Agencies within the City of Ottawa who is participating in the Child Care Information Centralized Waiting list
- OCCCC auditors, financial and legal advisors
- Institutions providing the OCCCC with banking and payroll services
- Third-party companies that provide IT support

Personal Information is retained only as long as necessary to fulfill the purposes listed above or those identified at the time of collection, or as required by law (i.e. the retention requirements under the *Child Care and Early Years Act*). Once Personal Information is no longer required to fulfill the identified purposes or to comply with legal requirements regarding retention, it will be destroyed or rendered anonymous.

Accuracy: Personal Information will be kept as accurate, complete and up-to-date as necessary for the

purposes for which it is used. Individuals must inform OCCCC of any updates or changes to their Personal Information.

Safeguards: Personal Information is protected by security safeguards appropriate to the sensitivity of the information.

- Physical measures (locked filing cabinets, restricting access to offices, alarm systems);
- Technological tools (passwords, encryption, firewalls); and
- Administrative controls (limiting access on a "need-to-know" basis and confidentiality policies).

Only the Early Learning Services Manager and designated individuals have access to Personal Information.

Openness: Information about our policies and practices relating to the management of Personal Information is available on written request to the Early Learning Services Manager

Individual Access: Upon request, an individual will be provided with information about the existence, use, and disclosure of their Personal Information and will be given access to that information. Requests for access to Personal Information must be made in writing to the Early Learning Services Manager, and acceptable proof of identification will be required. The OCCCC then has 30 days to respond to the request or provide the individual with the legal basis for which the request is denied.

The individual may challenge the accuracy and completeness of their Personal Information and have it amended as appropriate.

Challenging Compliance: If an individual has concerns over the OCCCC's compliance with this Policy, they should address their concern in writing to:

*Early Learning Services Manager,
Ottawa Catholic School Board,
570 West Hunt Club Rd. Nepean,
ON K2G 3R4,
Tel: 613-224-4455 x 2382 Fax: 613-225-9072*

An individual also has the right to contact the Privacy Commissioner in circumstances where an individual has a concern with respect to the OCCCC's collection, use or disclosure of Personal Information for commercial purposes.

*Office of the Privacy Commissioner of Canada,
30 Victoria Street, Gatineau, QC, K1A 1H3.
Toll-free: 1-800-282-1376; Phone: (819) 994-5444; TTY: (819) 994-6591*