



Approved By: Board of Directors
Effective Date: January 30, 2018
Review Date: June 5, 2023
Next Review: June 2026

PRIVACY POLICY & CONSENT

Sarnia-Lambton Rebound recognizes its employees, clients, volunteers, Board of Directors, subcontractors, and donors are all integral in its operations. It is important that each person understand that we value and protect privacy and the confidentiality of personal information we learn about persons because of employment, assignment, volunteerism, and engagement in a contract.

This privacy policy is designed to explain to you what personal information Sarnia-Lambton Rebound collects about you and the use of which Rebound puts that information. The policy also explains how your personal information is kept safe and secure from inappropriate disclosure or use.

For the purpose of this policy, “personal information” means any information, recorded in any form, about an identified individual, or an individual whose identity may be inferred or determined from such information.

Collection and Use of Personal Information

Client Files

All client files must be kept in a locked filing cabinet, locked in the Program Coordinator’s office or File Room. No one except staff will have access to the key to this cabinet. Files will be locked up at all times unless being worked on. Files that are being worked on will be kept secure from visitor’s view. Any client files that leave the building must be kept in a locked briefcase and only with an authorized Program Coordinator. The destruction of any client files will occur only by supervised shredding in a confidential setting.

Application and Payroll Information

As soon as you are engaged, Sarnia-Lambton Rebound begins keeping a human resources personnel file on you.

Examples of some of the information your file might contain include the following:

- Resume, interview notes, reference checks
- Letters of offer and acceptance of employment (contract)
- Goals and performance appraisals
- Payroll information, including social insurance number, taxation forms, banking information, RRSP information (if applicable)
- Wage and benefit information, including promotions and changes to terms of employment, short term and long-term disability, medical and dental care, etc.



- Criminal reference check and vulnerable persons sector check
- Emergency contact and medical information
- Information regarding WSIB claims, payroll garnishments, court orders
- Training



Most of the information listed above is required to ensure you are properly identified as an employee of Sarnia-Lambton Rebound and that you are on the payroll. For volunteers, some of this information is not required and may not be collected. Emergency information is required in case we need to notify anyone of your involvement in an emergency while at work.

Performance Information

While a member of Sarnia-Lambton Rebound staff, you will be periodically evaluated, and changes to your status may occur. For example, you may receive wage increases and promotions. You may also complete internal or outside courses. This information is collected and maintained and utilized so that Sarnia-Lambton Rebound can properly evaluate your performance and determine appropriate level of compensation. This information may be shared with various staff of Sarnia-Lambton Rebound but only in the context that is used to assess performance, discipline where necessary, and compensation.

Examples of performance information that may be added to your file throughout the course of your tenure include:

- Copies of performance appraisals
- Mandatory policy sign-off sheets
- Internal communications regarding performance
- Corrective action forms
- Memorandums regarding completion of internal and outside courses
- Records of absences from work

Other Information

Sarnia-Lambton Rebound monitors internet and email usage to help prevent inappropriate use of its computer and network resources. Accordingly, personal information regarding your email and internet use may be collected. In rare circumstances, Sarnia-Lambton Rebound may collect other information about you without your knowledge or consent. This would occur only when authorized by applicable legislation. An example would be if Sarnia-Lambton Rebound must investigate an allegation of harassment or another alleged breach of your obligations as a member of Sarnia-Lambton Rebound staff.

Disclosure of Personal Information

Your employment, volunteer or contract personnel file is securely maintained in a locked cabinet and housed in the locked office of the Executive Director. Sarnia-Lambton Rebound will share your personal information only when necessary, with management or office staff members of Sarnia-Lambton Rebound who need. Examples would be sharing your banking information to ensure that you are properly compensated on time, or those who are involved in your hiring, promotion, discipline, termination or to extend wishes for occasions such service recognition,



birthday, congratulatory or sympathy wishes. Personal information in electronic form is stored and secured in a password encrypted area of the Rebound network with appropriate levels of security.

Retention of Personal Information

Your personal information will be maintained in your personnel file for as long as you are a staff member of the company. Some of the information relating to payroll and compensation must be maintained for at least 7 years after you leave Sarnia-Lambton Rebound, as these documents are required by law for audit and taxation purposes. Information that is not necessary for audit and taxation purposes may be destroyed 3 years after your last date of employment. Some information, including employment contract, date of hire and date of termination, and your last address and telephone number will be maintained indefinitely.

Accuracy of Personal Information

To some extent, Sarnia-Lambton Rebound relies on our staff to update their own personal information. For example, if you have had a change of address or telephone number, marital status, or if you wish to make changes to your employee benefits plan, etc., you should approach your Business Manager staff member and request that your file be updated. Unless you advise Sarnia-Lambton Rebound of these important changes, Sarnia-Lambton Rebound has no way of knowing about them.

Sarnia-Lambton Rebound recognizes that the information we collect regarding your performance is based on opinion and evaluation. To the best of our ability, we ensure that the performance portion of your file is complete, in that it contains all information related to your performance, including any documents or other information you supply to us on your own behalf.

Accuracy of Personal Information

Sarnia-Lambton Rebound is committed to ensuring that we collect only the personal information about you that we need to ensure an effective relationship. Sarnia-Lambton Rebound is also committed to ensuring that information about you is accurate and up to date. Sarnia-Lambton Rebound will provide you with the information we have about you when you make a written request.

In some cases, Sarnia-Lambton Rebound may not be able to provide you with all the information we have about you. This would occur where the law prevents disclosure, for example, if provision of the information could lead to disclosure of another individual's personal information. If we decide not to disclose some or all, of your personal information to you, we will advise you on the reason.

In order, to ensure compliance with our privacy policy, Sarnia-Lambton Rebound has appointed a Privacy Officer to oversee all aspects of its employee privacy policy and practices. If you wish



to know what information Sarnia-Lambton Rebound currently, has about you, you should send a written request to the Privacy Officer, who will respond to your request within 10 days. If you become aware that the information, we have about you is incorrect, you should notify the Privacy Officer, who will review the information and take appropriate steps to address your concern.

Complaints and Concerns

If you are dissatisfied with Sarnia-Lambton Rebound’s privacy policy or practices, or with the result of your request to access or correct your personal information, you should make a written complaint to the Privacy Officer. The Privacy Officer will then investigate the matter, which may require the involvement of management. The Privacy Officer will report back to you and advise you of any steps taken to correct the problem.

ACKNOWLEDGEMENT AND CONSENT

I acknowledge receiving a copy of this employee information privacy policy and consent to the collection, use and disclosure of my personal information as set out in this policy.

Employee/Volunteer Name (Please print)

Employee/Volunteer Signature

Date