Personal Information Protection Policy



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Girls Inc. of Northern Alberta Personal Information Protection Policy

Purpose

Girls Inc. of Northern Alberta is committed to safeguarding the personal information entrusted to us by our stakeholder. The organization shall manage personal information in accordance with <u>Alberta's Personal Information Protection Act (PIPA)</u> and other applicable laws. A copy of this policy is provided to any stakeholder on request.

Policy statement

What personal information do we collect?

Personal information we collect includes but not limited to an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, etc.

Why do we collect personal information?

Girls Inc. of Northern Alberta collects only the personal information that is needed to

- a. Provide evidence-based curricula to stakeholders including SSBOMS (Strong, Smart and Bold Outcomes Measurement Strategy)
- b. deliver requested products and services
- c. enroll a stakeholder in a program
- d. or for an employment relationship purpose. The organization shall typically collect stakeholder personal information directly from its stakeholders, information may also be collected from other people with consent of the owners of such information or as authorized by law.

Stakeholders are informed, before or at the time of collecting personal information, of the purposes for which information is being collected. The only exception to this is when a stakeholder volunteers' information for an obvious purpose (for example, producing a credit card to pay a fee when the information will be used only to process the payment).

Information collected are used and disclosed only for the purpose for which the information was collected, except as authorized by law. For example, stakeholder contact information may be used to deliver goods.

If the organization wishes to use or disclose personal information for any new business purpose, a request for consent will be made. Consent may not be sought, if the law allows this (e.g., the law allows organizations to use personal information without consent for the purpose of collecting a debt).

Girls Inc. delivers evidence-based curricula to inspire more girls to be strong, smart, and bold. We believe that measuring outcomes is critical to having a real and lasting impact on girls. As such, we have developed the Strong, Smart, and Bold Outcomes Measurement Strategy (SSBOMS) to document the measurable difference a high-quality Girls Inc. Experience makes in girls' lives. This is also to foster a culture of continuous improvement and collective learning across the Girls Inc. network. In doing so, personal information collection of our stakeholders (girls and parents/guardians) has become essential to better inform program designs and strategic directions of Girls Inc. This girl-centered data collection and use strategy relies on two main informational sources:

The Strong, Smart, & Bold Outcomes Survey (SSBOS), administered annually through secure knowledge management database specified by Girls Inc. National.

The SSBOS gathers data using survey questions that have been carefully designed to measure girls' (ages 6-18) progress toward specific Strong, Smart, and Bold outcomes.

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Tracking girl characteristics and attendance allows us to examine important topics, like whether we are reaching the girls who may need us most, and how many program hours girls need in order to experience a meaningful, positive impact.

Consent

Girls Inc. requests for consent to collect, use, or disclose stakeholder personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law.

The organization may presume consent in cases where stakeholder volunteer information for an obvious purpose and shall presume consent to continue to use and, where applicable, disclose personal information that is already in possession, for the purpose for which the information was collected. Consent may be requested in writing or orally (in person or telephone)

Only when required by law, will the organization collect, use, or disclose stakeholder personal information without consent. For example, consent may not be requested when the collection, use or disclosure is to determine suitability for an honour or award, or in an emergency that threatens life, health, or safety.

What personal Staff information do we collect, use, and disclose?

We collect, use, and disclose personal Staff information to meet the following purposes:

- Establishing, managing, or terminating an employment relationship
- Determining eligibility for employment or volunteer work, including verifying qualifications and references
- Establishing training and development requirements
- · Assessing performance and managing performance issues if they arise
- Administering pay and benefits (paid Staff only)
- Processing Staff work-related claims (e.g., benefits, workers' compensation, insurance claims) (paid Staff only)
- Complying with requirements of funding bodies (e.g., lottery grants)
- Complying with applicable laws (e.g., Canada Income Tax Act, Alberta Employment Standards Code)

What information do we provide for employment/volunteer references?

In some cases, after employment or volunteer relationship with the organization ends, Girls Inc may be contacted by other organizations and asked to provide a reference. It is our policy not to disclose personal information about our Staff and volunteers to other organizations who request references without consent. The personal information we normally provide in a reference includes:

- Confirmation that an individual was a Staff or volunteer, including the position, and date range of the employment or volunteering.
- General information about an individual's job duties and information about the Staff or volunteer's ability to perform job duties and success in the employment or volunteer relationship.

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Audit Control -How do we safeguard personal information?

Girls Inc. shall make every reasonable effort to ensure that personal information is accurate and complete. Stakeholders are relied on to notify the organization of changes or inaccuracies in personal information that may affect relationship and communication with the organization. Girls Inc. will take every reasonable step to correct such errors as soon as practicable, and in some instances written permission may be requested for correction of personal information.

The organization shall protect personal information in a manner appropriate for the sensitivity of the information and make reasonable effort to prevent any loss, misuse, disclosure, or modification of personal information, as well as any unauthorized access to personal information.

Girls Inc. use appropriate security measures when destroying personal information, including shredding paper records, and permanently deleting electronic records. Personal information is retained only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

Access to records containing personal information.

Individuals have a right to access their own personal information in a record that is in the custody or under the control of Girls Inc., subject to some exceptions. Under <u>PIPA</u>, Girls Inc. is required to refuse to provide access to information that would reveal personal information about another individual. If a request is refused in whole or in part, reasons for the refusal will be provided. In some cases where exceptions to access apply, we may withhold that information and provide the stakeholder with the remainder of the record. The organization will make every effort to respond to stakeholder request within 60 calendar days unless an extension is granted.

A fee is not charged when the request is for personal Staff information and in cases where a fee needs to be charged from any stakeholder, the organization will advise stakeholder of such before the request is processed.

Questions and complaints

Girls Inc. of Northern Alberta shall take every reasonable and feasible step to ensure questions and concerns about any collection, use or disclosure of personal information or about a request for access to an individual's personal information are answered effectively.

If Stakeholders have a question or concern about any collection, use or disclosure of personal information by Girls Inc. or about a request for access to their own personal information, the Executive Director can be reached at 780-790-9236 or ed@girlsincofnorthernalberta.org

If for any reason, stakeholders are not satisfied with the response received, the Information and Privacy Commissioner of Alberta can be contacted as below:

Office of the Information and Privacy Commissioner of Alberta Suite 2460, 801 - 6 Avenue, SW Calgary, Alberta T2P 3W2

Phone: 403-297-2728 Toll Free: 1-888-878-4044

Email: generalinfo@oipc.ab.ca Website: www.oipc.ab.ca