

Corporate Policies and Procedures			
DEPARTMENT: Human Resources			POLICY #: HR-13
POLICY: Policy on Privacy of Personal Information			
DATE: November 2021	REV. DATE:	COVERAGE: All Employees	PAGE #: 1 of 3

PURPOSE

The Municipality is committed to protecting the privacy and security of the personal information of its employees by adhering to the *Municipal Freedom of Information and Protection of Privacy Act* in the collection, use, disclosure, and disposal of personal employee information.

POLICY

Definition of Personal Information

1. For the purposes of this policy, personal information includes information in any form that is reasonably required by us for the purpose of establishing, managing or terminating our employment relationship. This includes:
 - a) an employee's race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital or family status, political beliefs, or associations;
 - b) educational, medical, psychiatric, psychological, criminal, or employment history;
 - c) identifying numbers assigned to the employee, e.g. social insurance number;
 - d) personal address, telephone number, fingerprints, or blood type of the employee;
 - e) resumés, letters of reference and reference checks;
 - f) opinions, evaluations or comments about your performance;
 - g) disciplinary measures; and/or
 - h) employee files, credit records, loan records, medical records.
2. Personal information does not include your name, title, business address or business telephone number.

Collection, Use and Disclosure

3. Before collecting personal information, individuals must consent to the specific use of personal information about them. Normally, employee personal information is collected for the purposes of:
 - a) recruiting and contracting purposes;
 - b) administering payroll and benefit plans;
 - c) processing any benefit or other claims, such as WSIB or medical related claims;
 - d) managing an employment relationship, including any performance evaluations, incentive programs or disciplinary measures;
 - e) establishing training or development requirements;

Corporate Policies and Procedures			
DEPARTMENT: Human Resources			POLICY #: HR-13
POLICY: Policy on Privacy of Personal Information			
DATE: November 2021	REV. DATE:	COVERAGE: All Employees	PAGE #: 2 of 3

- f) identifying a contact person in the event of an emergency; and/or
 - g) complying with applicable employment and human rights legislation.
4. Every employee has the right to access his/her own personal information e.g. an employee can access, with sufficient notice, all personal documentation in his/her employee file(s). The only exceptions are the following:
 - a) evaluative information collected in a reference check if the disclosure reveals the identity of the information source, and the source expected that his/her identity would be held in confidence (this information is retained on the competition file rather than in the employee file); and/or
 - b) information that would disclose personal information about another party.
 5. An employee can request correction of his/her personal information if there is an error or omission or, alternatively, he/she may require that a statement of disagreement is attached.
 6. No document is removed from an employee's file or photocopied without the approval of the Department Head.
 7. Employees have access to other employees' personal information only on a need-to-know basis necessary to the performance of their duties.
 8. Other individuals/organizations have access to employees' personal information only under the following circumstances:
 - a) if the employee has given consent;
 - b) if the information is required for the purpose for which it was obtained;
 - c) if legislated e.g. reporting of employee accidents to the Workplace Safety and Insurance Board or to a law enforcement agency;
 - d) in compelling circumstances under which a delay in obtaining information may be injurious to an individual's health and safety; and/or
 - e) in compassionate circumstances in order to facilitate contact with next-of-kin or a friend of an individual who is injured, ill, or deceased.
 9. If an organization contacts the Municipality for reference information on an employee or former employee, the information is only disclosed if the organization has the written authorization of the employee.

Corporate Policies and Procedures			
DEPARTMENT: Human Resources			POLICY #: HR-13
POLICY: Policy on Privacy of Personal Information			
DATE: November 2021	REV. DATE:	COVERAGE: All Employees	PAGE #: 3 of 3

10. Reasonable measures are implemented to prevent unauthorized access to employee records, to ensure that those individuals who need a record for the performance of their duties have access, and that records are protected from inadvertent destruction and/or damage.