

CLIENT RECORDS COLLECTION & DISCLOSURE POLICY

Approved By	Executive Management Team
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Responsible Role	Chief Privacy Officer (Manager, Business Analysis)
Responsible Department	Chief Privacy Officer

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SECTION 1 - INTRODUCTION

1.1 Purpose

This Privacy Policy describes the personal information that JVS Toronto collects from or about its clients, how it uses this information, and to whom it discloses that information; unless the personal information is collected, used or disclosed through the JVS Toronto website. This personal information is dealt with in the JVS Toronto Web Site Privacy Statement. See definition below.

1.2 Scope

The policy applies to all JVS Toronto employees, volunteers including Board and Board Committee members, placement students, contractors or consultants, and anyone working at or acting on behalf of JVS Toronto, and who are privy to personal information.

1.3 Definitions

Word/Term	Definition
Abuse	Abuse refers to any act or situation, which may be physical, verbal, sexual, psychological or financial in nature, which results in harm or creates the possibility of harm to a person.
Chief Privacy Officer	A member of the JVS Toronto management team who is appointed with the responsibility for managing the privacy policies, inquiries, compliance, complaints, breaches, investigations, resolutions, practice modifications and implementation on behalf of the organization.
Consent	Obtaining an individual's permission for something to happen or agreement to do something.
Disclosure	Personal information about an individual being provided to someone other than the individual or his/her substitute decision-maker or when confidential information is shared.
Duty to Warn	Duty to warn refers to the responsibility of a therapist or similar profession to inform authorities or third party if a client poses a threat to himself or herself or to another identifiable individual
Explicit Consent	This refers to an individual, or someone acting on their behalf, clearly presented with the option to agree or disagree with the collection, use, or disclosure of personal information prior to receiving any services.
Implicit Consent	1. The individual voluntarily provides personal information for the collection, use, or disclosure for purposes that would be considered obvious at the time. 2. The individual provides personal information that is used in a way that clearly benefits the individual.
Implied consent	1. An individual voluntarily provides personal information for the collection, use, or disclosure for purposes that would be considered obvious at the time. 2. The individual provides personal information that is used in a way that clearly benefits the individual. Example: offering references to a potential employer and understanding that this action give the potential employer permission to contact the references
Informed Consent	This means an individual provides consent after they are informed about the expected benefits, potential risks, alternative courses of action, and the likely consequences of receiving or not receiving services, and having the opportunity to ask questions.

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Personnel	This refers to anyone working on behalf of JVS Toronto including full-time, part-time, casual and other employees, volunteers including Board and Board Committee members, placement students, contractors or consultants.
JVS Toronto Personnel - Paid	Refers to an individual who works for JVS Toronto in a paid capacity, includes but is not limited to employees, managers, directors, senior management, casual and contract workers, consultants, and Third Party Service Providers.
JVS Toronto Personnel - Unpaid	Refers to an individual who works for JVS Toronto in a voluntary capacity.
Non-Records	Administrative data or communications, transient memoranda, notes and memoranda having limited or short-term value or usefulness. Non-records can be generated and/or destroyed at any time without having the need to consult this policy. Purging of non-records is encouraged so as to avoid keeping unnecessary and cumbersome files. Examples of non-records include draft client reports, draft budgets, copy of a staff letter.
Lock box	The term “lock box” describes the limits that clients can place on the use and disclosure of their personal information.
Opt-out Consent	This means that an individual is given the option to decline consent. If the individual does not clearly decline consent, consent is granted. Opt-out Consent is usually done in writing.
Personal Information	Under Personal Information Protection and Electronic Documents Act (PIPEDA), personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as: <ul style="list-style-type: none"> • age, name, ID numbers, income, ethnic origin, or blood type; • opinions, evaluations, comments, social status, or disciplinary actions; and • Employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs).
Records	Include accounts, agreements, books, charts, tables, diagrams, forms, images, business documents (invoices, financial statements, etc.), letters, memos, client records, statements, vouchers or any other thing which contains information whether written or in any other form (electronic or otherwise).
Service Team	Refers to those in the team who are involved in service provision of a particular client. Once initial informed consent is obtained from the client, members of their service team are assumed to be included in that consent and can collect, use and disclose the client’s personal information for the provision of services to the client, unless they know that the client has expressly withheld or withdrawn consent.
Substitute Decision-Maker	Every individual is presumed capable of making his or her own decisions about receiving services unless there are reasonable grounds to believe otherwise. A substitute decision maker is someone authorized to make decisions on behalf of an individual who has been deemed incapable of making his or her own decisions.
Website Privacy Statement	This statement informs website visitors what information is collected by the website and how this information is used.

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1.4. Related Policies

1.4.1 Privacy Policies

1.4.2 Additional Policies

Code of Conduct Policy

Protection of Human Rights and Prevention of Violence and Harassment in the Workplace Policy

Internet & Email Policy

Mobile Device Policy

Password Policy

Whistleblower Policy

1.5 Legislative Context

Child and Family Services Act

Health Care Consent Act

Personal Health Information Protection Act (PHIPA)

Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act

The Mental Health Act

The College of Psychologists of Ontario

The Ontario College of Social Workers and Social Service Workers

SECTION 2 - POLICY

2.1 Policy

Records are to be collected and disclosed in a manner consistent with JVS Toronto Enterprise Privacy Policy Principles and applicable legislations to safeguard the privacy of clients in relation to the following criteria:

- The collection and disclosure as prescribed by various municipal, provincial and federal statutes that govern JVS Toronto funders and those that apply to JVS Toronto;
- The collection and disclosure prescribed by professional standards for specific professions, such as for psychologists and members of the College of Psychologists, that is governed by specific ethics, guidelines, legislation and/or practices for a client's personal information; and
- Other criteria as established by JVS Toronto.

JVS Toronto's Privacy Policies:

1. JVS Toronto Enterprise Privacy Policy
2. Business and Remote Office Privacy and Security Policy
3. Records Retention and Destruction Policy
4. Personnel Records Collection and Disclosure Policy
5. Client Records Collection and Disclosure Policy
6. Privacy Breach Policy
7. Privacy Complaint Resolution Policy

NOTE: The following section, 3, "RESPONSIBILITY & PROCEDURE" represents best practices as determined by JVS Toronto, and is largely designed to provide guidance to designated JVS Toronto representatives. However, it is understood that, where appropriate, these representatives may adopt modified procedures in response to any given circumstance.

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SECTION 3 – RESPONSIBILITY & PROCEDURE

3.1 Maintaining a Privacy Culture

The need to secure and maintain the privacy of collected is to be actively practiced by JVS Toronto. Although personal information records are traditionally viewed to be in a paper or electronic format, records can also be those that are verbally given and exchanged. As such, even as paper records are to be kept in locked files, verbal exchanges should be undertaken with full awareness of the privacy level of surroundings for any collection or exchange of personal information.

3.2 Collection of Client Information & Program Registration

In order to support JVS Toronto clients with the services they require it is vital to collect personal information from individual clients. The following procedures need to be followed to comply with privacy legislation and to honour the trust clients place in JVS Toronto by disclosing their personal information both at the time of program registration, and throughout the time that they remain a JVS Toronto client. Therefore, every JVS Toronto personnel is responsible to collect information from clients in a manner consistent with our Privacy Principles. Personal information may be collected in either a hard or soft copy format or verbally, depending on the nature and purpose of the information that is collected, and recorded on the appropriate consent form (see section 3.7, Supporting Documentation).

Consistent with Privacy Principles, JVS Toronto will:

- Identify the purposes for which personal information is collected prior to collection.
- Obtain the informed consent of the individual for the collection, use, or disclosure of the collected information. Consent is to be documented using the **Informed Client Consent to Collect, Use and Disclose Personal Information Form**.
- Limit collection of information to what is necessary for the purposes identified by JVS Toronto to allow JVS Toronto to provide the necessary services for the respective client.
- Use fair and lawful means to collect information.
- Limit use and disclosure of personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law.
- Retain only as long as necessary the personal information collected for the fulfillment of those purposes as outlined in **Records Retention and Destruction Policy**.
- Ensure accuracy, completeness and up-to-date status of personal information as is necessary for the purpose for which it is used.

3.2 (a) Informed Consent

It is the responsibility of the JVS Toronto personnel to obtain informed consent before commencing collection of personal information or service provision. Informed consent must be documented through the use of the client consent process done as part of the intake process using the **Informed Client Consent to Collect, Use and Disclose Personal Information Form**.

The client may also provide their explicit consent verbally over the telephone, and in that instance, it is the responsibility of the JVS Toronto personnel to complete the **Client Telephone Consent to Collect, Use and Disclose Personal Information Form**.

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3.2 (b) Valid Consent for Services

Before providing any services, JVS Toronto personnel are responsible to follow the following principles:

- Consent must be related to the proposed service.
- Client must be adequately informed prior to consenting.
- Consent must be informed, which requires individuals to receiving information about:
 - a) The service's expected benefits and potential risks.
 - b) Alternative courses of action.
 - c) The likely consequences of not receiving services.
 - d) The opportunity to ask questions.

3.3 Communication with Clients

To ensure that all client information is kept private, all communication with clients should be done individually over email, by telephone or in person. When the need arises to communicate information that pertains to several clients, a group email can be done using the BCC email feature which will keep all client email addresses hidden. Below is the process to use should it be necessary to send a group client email.

1. Obtain **written authorization** from your Manager to use the BBC email feature for a group email.
2. Draft the body of your email.
3. Place all email addresses in the BCC feature of the email using this process:
 - Select **New Email**
 - Select **Options** and click on click on **BCC**
 - Put your cursor in the **BCC field** and start typing or copying and pasting client email addresses
4. Save your email by clicking on the Save icon in the top navigation bar, or use Ctrl + S on your keyboard
5. Have your Manager review the email content and ensure all the client emails are securely in the BCC field
6. Send after receiving **written confirmation** from your Manager to send the email

3.4 Disclosure of Client Records

3.4.1 JVS Toronto's Responsibility

JVS Toronto personnel entrusted with personal information will only disclose without consent said personal information in compliance with the law.

JVS Toronto will clearly identify the purposes for which personal information will be or is being disclosed when obtaining informed consent. No collection or disclosure of personal information should take place under any circumstances without the client consent (which is to be documented with the required consent form), except as required by law.

When a third party disclosure request is received, JVS Toronto personnel will:

- Evaluate the request on the basis of the type, purpose and requesting party and whether other information can serve the purpose for which disclosure of personal information is sought.

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- Obtain and document client consent using the **Client Disclosure Consent Form** (a copy of the signed consent form should be included in the client's record, or the date of consent and date of disclosure should be noted in the file).
- Seek assistance from an appropriate resource, such as the program manager, the program director, or the Chief Privacy Officer, if a request is unusual or if there is uncertainty about whether disclosure should be made.

3.4.2 Types of Disclosure Requests

In order to comply with any requests of the nature outlined below, JVS Toronto must first obtain and document the client's consent using the **Client Disclosure Consent Form**. Should the client at anytime decide to withdraw their previously granted consent for the disclosure of information, JVS Toronto must ensure that the client completes the **Request for Withdrawal of Consent Form**.

3.4.2 (a) Disclosure to Family Members, Friends or Care Providers

If JVS Toronto is asked to disclose personal information about a client by a client's family member, friend or care provider, JVS Toronto can only provide this information with the client's consent, or that of their substitute decision-maker, using the **Client Disclosure Consent Form**.

Before releasing the requested information, the JVS Toronto personnel must:

- Understand the purpose for which the personal information is being requested.
- Verify that the client, or their substitute decision-maker, has consented to the disclosure of the personal information to the client's family members, friends or care providers.
- Document the consent by having the client complete the **Client Disclosure Consent Form**.
- Confirm the family member's, friend or care provider's identity.
- Only disclose personal information for which JVS Toronto has received consent to disclose and that serves the purpose for which the disclosure is requested.
- Document the date of the request and the disclosure of the personal information in the client's record.

3.4.2 (b) Disclosure to the Media and Public

The Marketing Department must obtain a client's consent before disclosing any personal information including, but not limited to taking and using the client's image, biographical details, service experience, quote and name for reproduction and communications use and distribution on the agency's website, intranet, social media accounts, publications, and in any other material. Once client consent is obtained, the **Media Release Form** must be used to document consent. The Marketing Department is responsible for coordinating agency and other events that may require the participation of clients, and obtaining written consent.

To ensure protection of client personal information from visiting members of the media on site the following practices should be followed:

1. Direct all media requests to the Marketing Department, who will ensure client consent and other arrangements in place.
2. All members of the media should be identified by a visitor's badge and should be escorted by a member of the Marketing Department, or JVS Toronto personnel member in their place, at all times while on JVS Toronto premises.

3.4.2 (c) Canadian Anti-Spam Legislation Consent

JVS Toronto requires client consent to be contacted for purposes other than direct service needs. The **Informed Client Consent to Collect, Use and Disclose Personal Information Form** and the **Client Telephone Consent to Collect, Use and Disclose Personal Information Form**

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include separate consent for **Canadian Anti-Spam Legislation** to send electronic messages about the agency (that is not part of your service/program provision), such as notices, announcements, events, fundraising activities, and other similar offers. Programs are responsible to put in place a mechanism that prevents any non-service communication from being sent to clients who do not provide consent to **Canadian Anti-Spam Legislation**.

3.4.3 (a) Disclosure without Consent – Mandatory Disclosure

Legislation specifically permits or requires the disclosure of personal information for a number of specific purposes. Consent is not required for these specific purposes. Based on current legislation, the following table outlines a number of relevant instances when disclosure is permissible or required. This is not an exhaustive list.

To whom disclosure must be made	What information must be disclosed	Relevant Statute
Children’s Aid Society (CAS)	Information about a child in need of protection (e.g., abuse or neglect).	<i>Child and Family Services Act</i>
Investigator	Information outlined on the warrant, summons, subpoena or other legal document	Personal Health Information Protection Act
Police	Any information about the possibility of that an individual with a developmental disability has experienced any form of abuse.	Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act
Police	Information about the report of a potential incidence of abuse of an individual with developmental disabilities.	<i>Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act</i>

3.4.3 (b) Duty to Warn

Duty to warn refers to the responsibility of a therapist, or similar-type professionals, to inform authorities or third parties if a client poses a threat to himself or herself or to another identifiable individual.

3.5 Lock Box

Clients have the right to expressly instruct JVS Toronto not to use specified personal information for specific purposes. Clients can also expressly instruct JVS Toronto not to disclose specified personal information to specific individual or anyone.

The term “lock box” describes the limits that a client can place on the use and disclosure of their personal information. The JVS Toronto personnel whose client has requested restricted access of their personal information will discuss with the client the impact of their restriction on the services or support that they are able to receive within JVS Toronto. The Program Manager or JVS Toronto personnel(s) within the client’s service team must obtain the client’s explicit consent before accessing and using the locked information.

Note, however, that a client cannot restrict a use or disclosure that legislation otherwise permits or requires.



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If a request for information in a lock box situation is made to JVS Toronto personnel, JVS Toronto must inform the requestor that the information is incomplete because the client has requested to “lock” it.

3.6 Client Access to Personal Records

Except under special circumstances noted in Section 3.5.3 **Guidelines for Refusal of Access**, clients have the right to access their service records. Clients can request access to their service records verbally or in writing. Verbal requests are appropriate when the client is still receiving services from JVS Toronto. Document that the client ask for and reviewed their service records in a case note.

When a client is no longer receiving services, the request needs to be made in writing by the former client, or their substitute decision-maker. Written requests must be accompanied by a completed and signed **Client Request Access to Personal Record File Form**.

If asked for access to a file or personal information, the JVS Toronto personnel is to:

- Verify the client’s identity, or that of the substitute decision-maker.
- Determine if the request contains enough detail for the record to be found. If additional information is required to find the record, work with the client to obtain the required information. Inform the client that additional time is required to obtain the record. Provide the client with written notification for additional time using **Sample Letter - An Extension to Comply with a Request to Access Personal Information**.

If the record cannot be located after a reasonable search, advise the requestor about this in writing using the **Sample Letter - Refusal of Access Letter**.

It is the responsibility of the Program Manager or Program Director to determine if one of the legal exceptions applies to providing access. Please see section 3.5.3 **Guidelines for Refusal of Access** of this policy for a description when access would be refused. If access is refused, it is the Program Manager’s or Program Director’s responsibility to complete the **Sample Letter - Refusal of Access Letter**.

3.6.1 Client Request to Correct Their Personal Record

The client may request that information in their finalized service record be corrected. All requests for correction must be made in writing by the client, or their substitute decision maker, using the **Client Correction Form for Personal Record Information and Instructions**.

The request to correct information must be reviewed by the Program Manager or Program Director, unless a program area requires higher level of approval (e.g. psychological services). The client must be notified in writing whether or not their request to correct their information has been agreed to by JVS Toronto using the **Sample Letter - Correction of Personal Record**.

3.6.2 Timeframe to Respond to a Request for Access

Requests for access should be considered and responded to as soon as possible. If more than 30 days are required to respond to a request for access, the Program Manager or Program Director is to provide the requestor with written notice of an extension.

	← Time to respond →	← Maximum Extension →
Date of Initial Request	30 days From Date of Request	60 Days From Date of Request

An extension is only permitted if:

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- Replying to the request within 30 days would reasonably interfere with work activities because locating the service record requires a complex search.
- The time required to undertake the necessary consultations would make it reasonably impractical to reply within 30 days.

The written notice of an extension should explain:

- When there will be a response.
- Why an extension is needed.

An extension cannot exceed an additional 30 days. If an extension is required, then the client or requesting party is to be advised by using the **Sample Letter - Extension to Comply with Request to Access Personal Information**.

3.6.3 Guidelines for Refusal of Access

There are various reasons why access to a client file or record must be refused, and the reasons are outlined in the following table. In each of the following situations, the Program Manager or Program Director should provide access to the part of the client file or record that is not impacted by the reason for refusal and that can reasonably be separated out from the client file or record. If access is refused, it is the program manager's responsibility to complete the **Sample Letter - Refusal of Access**.

Reason for Refusal of Access	Follow-Up Notification to Requestor	
	State that the request (in whole or in part) is being refused and note the reason for refusal	State that the confirmation or denial of the existence of such record is not being acknowledged
The record contains raw data from standardized psychological tests or assessments	X	
The record (or information in the record) is subject to a legal privilege that restricts disclosure to the requestor	X	
Other non-privacy legislation, or a court order, prohibits disclosure of client information to the requestor	X	
The information in the client file or record was collected/created in anticipation of, or for use in a proceeding that has not yet concluded		X
The information in the record was collected or created for an inspection, or an investigation, or a similar procedure that is authorized by law, but has not as yet concluded		X
Granting access to the client file or record could reasonably be expected to result in a risk of serious harm to the client or to others (Where there is a concern regarding the risk of harm, consultation with a physician or psychologist may occur before deciding to refuse access)		X
Granting access could lead to the identification of a person who themselves was required by law to provide the information in the record		X

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Granting access could lead to the identification of a person who provided the information in the record in confidence (either explicitly or implicitly) and it is considered appropriate to keep the name of this person confidential		X
The request for access is frivolous, vexatious or made in bad faith	X	
The identity or authority of the requestor cannot be proven by the requestor. Therefore, the requestor may not be valid or genuine	X	

3.6.3 (a) Legal Exception to Access

- Tell the requestor in writing that JVS Toronto is refusing access, in whole or in part, and the reason for this.
- Where possible, sever the record and provide access to the part of the record where no legal exception applies.
- Tell the requestor about JVS Toronto's complaints procedure, and that if the requestor is not satisfied with the resolution of their complaint, that the requestor can complain to the Chief Privacy Officer.
- In some circumstances, JVS Toronto cannot even tell the requestor that a personal record exists.

3.6.3 (b) Access Allowed

- If no legal exception applies and the record is found, arrange to provide access. Access can be provided by showing the requestor the original record. If the requestor is shown the original record, arrange for the requestor to be monitored while viewing the record to ensure that it is not altered in any way.
- Access can also be provided by giving the requestor a copy of the record. If the requestor requests a copy of the record, it must be provided to them. If reasonably practical, answer any questions about any terms or abbreviations used in the record.

3.6.4 Urgent Requests for Access

If a requestor can satisfy the Program Manager or Program Director that their request is urgent, the program manager must provide access within the requested time period, if it is reasonable to do so.

3.6.5 Failing to Respond to a Request for Access

If access is not provided within the stated time period noted in this policy, the requestor can assume that their request has been refused. The requestor can complain to the Chief Privacy Officer about the refusal of a request for access. JVS Toronto will have to justify the decision to refuse access. It is an offence to dispose of records so that a request for access is not responded to and JVS Toronto may face penalties if this offence is committed.

Failure to comply with the practices, processes and conduct outlined above may result in disciplinary action up to and including termination of employment and/or the individual's relationship with JVS Toronto.

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3.7 Supporting Documentation

Name	Location	Document Type
Informed Client Consent to Collect, Use and Disclose Personal Information Form (includes Canadian Anti-Spam Consent)	JVS Insider	PDF
Informed Client Telephone Consent to Collect, Use and Disclose Personal Information Form (includes Canadian Anti-Spam Consent)	JVS Insider	PDF
Client Disclosure Consent Form	JVS Insider	PDF
Client Request For Withdrawal Of Consent Form	JVS Insider	PDF
Media Release Form	JVS Insider	PDF
Request To Access Personal Record	JVS Insider	PDF
Sample Letter – Extension to Comply with a Request to Access Personal Information	JVS Insider	Word
Sample Letter – Refusal of Access Letter	JVS Insider	Word
Client Correction of Personal Information and Instructions Form	JVS Insider	PDF
Sample Letter – Correction of Personal Record Letter	JVS Insider	Word
Client Consent to Third-Party Observation	JVS Insider	PDF
Website Privacy Statement	JVS Insider www.jvstoronto.org/privacy-policy/	Web Page

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SECTION 4 – GOVERNANCE

4.1 Policy Owner

Policy Owner	Chief Privacy Officer
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4.2 Version Control and Change History

Version Number	Approval Date	Approved by	Amendment
Version 9	n/a	n/a	This policy was reviewed and edited for clarity on July 18, 2019.
Version 8	n/a	n/a	This policy was reviewed and editing for clarity on September 7, 2018.
Version 7	n/a	n/a	This policy was reviewed and edited for wording additions on August 10, 2018.
Version 6	n/a	n/a	This policy was edited on November 14, 2017 to change the position responsible for the Chief Privacy Officer.
Version 5	n/a	n/a	This policy was reviewed on December 22, 2016 and minor wording changes were made to reflect staffing changes and currently used internal terms.
Version 4	n/a	n/a	This policy was reviewed and edited on March 20, 2014 as part of the Imagine Canada accreditation process.
Version 3	n/a	n/a	This policy was reviewed and edited for formatting consistency on June 26, 2013.
Version 2	September 20, 2011	EMT	This policy has been developed as part of a full agency policy review.
Version 1	March 22, 2011		