

PRIVACY POLICY AND PROCEDURES	Policy/Procedures #: 3.22
	Date: May, 2004

**ASSOCIATION OF CANADIAN COMMUNITY COLLEGES
PRIVACY POLICY AND PROCEDURES**

Whereas the Association of Canadian Community Colleges respects the privacy of its employees, members, Directors, clients, partners, contractors and other stakeholders, and makes every effort to protect information in its possession,

And Whereas effective January 1, 2004, the Association of Canadian Community Colleges is required to comply with federal privacy legislation entitled the Personal Information Protection and Electronic Documents Act (PIPEDA),

The following Policy and Procedures have been adopted to meet the requirements of PIPEDA:

1. POLICY STATEMENT:

The Association of Canadian Community Colleges is committed to protecting and safeguarding the personal information that it collects during the course of its various activities and projects. Maintaining the trust of employees, member institutions, Directors, clients, partners, contractors and other stakeholders is a permanent and ongoing endeavour. With the growth of electronic media, it is also necessary to take steps to protect the privacy of the individual.

Personal information entrusted to the Association is secure and will not be used for purposes other than what is required to deliver its services. Privacy practices enable the Association to be transparent and accountable in how it treats information that is shared with the Association.

The Association is also committed to continue to review its Privacy Policy to ensure relevance and currency with changing industry standards, technologies and laws.

2. PRIVACY PRINCIPLES:

Principle 1. Accountability:

Each employee is responsible for personal information under his or her control. The Association has appointed a Privacy Coordinator to ensure compliance to the Policy and applicable law.

Principle 2: Identifying Purposes:

The purposes for which personal information is collected shall be identified at or before the time the information is collected.

Principle 3: Consent:

The prior knowledge and permission of the individual will be required for the collection, use or disclosure of personal information, except when required for legal purposes.

Principle 4: Limited Collection:

The collection of personal information shall be limited to that which is necessary for the purposes identified. Personal information shall be collected by fair and lawful means.

Principle 5: Limiting Use, Disclosure and Retention:

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the permission of the individual or as required by law and will be retained only as long as necessary for the fulfilment of those purposes.

Principle 6: Accuracy:

The Association maintains procedures to ensure that the personal information that is collected and used is accurate, complete and current as is necessary for the purposes for which it is to be used. However, the Association relies on the individuals to disclose all material information and to advise of any changes. Individuals may, with proof of entitlement, request to access and if applicable, request a correction of information in the Association's possession.

Principle 7: Safeguards:

The Association applies appropriate safeguards to computer networks and physical files to protect personal information from unauthorized access, unintended disclosures or theft.

Principle 8: Openness:

The Association shall make readily available to employees, members, Directors, clients, partners, contractors and other stakeholders specific information about access and procedures relating to the management of their personal information.

Principle 9: Individual Access:

Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information, and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Principle 10: Challenging Compliance:

Individuals may address any concern or complaint regarding the compliance to this Policy to the Privacy Coordinator.

3. DEFINITION:

Personal information is any information that can be used to distinguish, identify or contact a specific individual. It includes information such as a person's personal or business e-mail address, credit card numbers, home address, etc. It does not include the name, title, business address or business telephone number of an employee of an organization.

4. PROCEDURES:

a) Application:

This policy applies equally to the personal information currently in the Association's possession or to be in the Association's possession for all Association employees, member institutions, Directors, clients, partners, contractors and other stakeholders.

All parties involved in any process or procedure related to this Policy are pledged to confidentiality.

b) Accountability:

The Manager, Human Resources and Administration is the Association's Privacy Coordinator. The Privacy Coordinator is accountable to the President for the Association's compliance to all applicable privacy legislation and to this Policy, and will help enhance the Association's reputation vis-à-vis privacy practices.

Management has the responsibility to be familiar with the Association's Privacy Policy and the protection offered under privacy legislation.

Each employee is also responsible for the protection of personal information under his or her control.

c) Disclosure of Personal Information:

The Association makes use of, and/or discloses, personal information in accordance with:

- the consent provided by the individual to whom the information relates
- the Privacy Policy
- our contractual rights and obligations
- the law.

Personal information shall not be used by the employees for purposes other than as required in the performance of their employment duties.

The Association sometimes retains external parties to perform on its behalf, certain functions in support of the services that the Association provides. Such functions could include but not limited to, payroll/benefit services, credit card payment processing and auditing services. Accordingly, these external parties will be provided with personal information to the extent that it is required in the performance of those specific functions. The Association obligates these parties to use and take steps to protect personal information in accordance with the requirements of the Privacy Policy.

The Association does not sell member lists or other personal information.

d) Compliance:

Every reasonable effort will be made to maintain accurate and up-to-date information. Any questions, concerns, complaints or requests may be forwarded to:

Privacy Coordinator
Association of Canadian Community Colleges
1223 Michael St. North Suite 200
Ottawa, Ontario
K1J 7T2
Tel: 613-746-2222