

This policy shall be made publicly available:

- On the client information boards at both buildings
  - On the Employment Hamilton web-site
- Copies can also be requested from any staff member

**EMPLOYMENT HAMILTON (EH)** is committed to complying with the Privacy Standards outlined in the Personal Information Protection and Electronic Documents Act. Our information handling practices have been established to respect and enforce our clients' right to privacy.

All Information related to an identified individual, business or organization must be treated as confidential. This information may be written, verbal, electronic, or in other forms.

Confidentiality extends to everything **EH** personnel learn in carrying out their duties. It extends to both important and unimportant information, background information, the process and everything the client discloses with a view to giving a better understanding of the situation. Everything the Executive Director or staff member learns from conversation or assessments of the client, conduct, financial state, and personal status is strictly confidential. It is the responsibility of the Executive Director and Staff to keep it so.

All information concerning clients and the operations of **EH** and activities shall be held in strict confidence and shall not be discussed with anyone other than those appropriately concerned.

#### What Information is collected and how is it used?

The type of information **Employment Hamilton** gathers and uses depends on the program that the client is accessing as each program has its own information requirements. Information which is essential for participating in our programs typically includes: personal information, non-personal information and information that does not identify the individual. Personal and non-personal information is usually collected at the point of intake to assess client and employer needs and eligibility. Where the client provides information regarding source of income, this information may be used to assist the client with achieving their goals.

#### Personal Information.

Personal Information as defined by the Personal Information Protection and Electronic Documents Act is information about an "identifiable individual". With consent **Employment Hamilton** may collect Personal Information through our Resource Centre, our Employment Counsellors, over the telephone, via email or the internet. The more information that our clients offer, the better we can help them achieve their employment goals. By sharing information with our Employment Counsellors, we are able to accurately assess client needs and eligibility for the government programs we deliver.

**Employment Hamilton** will only use personal information for the purpose it is collected. Should for any reason personal information be required to fulfill a different purpose, **EH** will obtain consent before proceeding. The choice to provide **EH** with personal information is always up to the client. The decision to withhold particular details may limit the services and programs we are able to provide.

**Employment Hamilton** will make a reasonable effort to make sure customers understand how their personal information will be used. **EH** will obtain consent from its clients when it collects or uses the personal information. A client's consent can be express or implied. A client can withdraw consent at any time, with certain exceptions. **Employment Hamilton** however, may collect, use or disclose personal information without the client's knowledge or consent in exceptional circumstances where such collection, use or disclosure is permitted, or as required by law.

#### When Authorized by the Client:

When a client provides personal information to us, we may communicate and disclose it to third parties for the purpose of fulfilling our mandate or services to them. Clients are advised of all incidents where information may be forwarded to a third party and request for consent (verbal or written) will be given.

As part of our employment services to employers **Employment Hamilton** provides resumes to employers for their consideration. By submitting a resume, individuals consent to having their information disclosed to the employer and employment opportunity.

While **Employment Hamilton** takes all reasonable precautions to ensure the information provided to us is not used by third parties for purposes other than those described in the Privacy Policy, **Employment Hamilton** is not responsible for any improper use of personal information that is beyond our reasonable control.

#### Web-site Links

The **Employment Hamilton** web-site, [www.employmenthamilton.com](http://www.employmenthamilton.com), links to other related sites which may be of interest to our clients and web-site visitors. Although we try to link with sites that share our commitment and respect for privacy, please understand that we are not accountable for the privacy practices recognized by other sites.

#### How We Protect Personal Information

**Employment Hamilton** is committed to ensuring all personal information is protected against unauthorized access, disclosure or misuse. All security measures are appropriate to the sensitivity level of personal information. Our security practices are reviewed on a regular basis to ensure that confidentiality and privacy of personal information is not compromised.

Personal information is kept while an individual is a client of **Employment Hamilton** and then is securely stored for a period of time after, as stipulated by our funding contracts. Once the required amount of time has been fulfilled, the information is safely destroyed in a secure manner.

#### Accessing and Amending Personal Information

Due to eligibility requirements for the programs and services offered by **EH**, it is important to have up-to-date and complete client records. As a client of **Employment Hamilton**, individuals have the right to access, confirm and amend their personal information.

If for any reason a client wishes to access their information, please submit a written request to our Privacy Officer. Requests for access will be addressed as quickly as possible, but no later than 30 days.

**Employment Hamilton** is accountable for the management and confidentiality of the information collected. Should you have questions or concerns regarding this policy, please feel free to contact our Privacy Officer in writing as we cannot guarantee the security of an email message.

#### **Privacy Officer**

**EMPLOYMENT HAMILTON**  
**67 Victoria Avenue South**  
**Hamilton, Ontario L8N 2S8**

**Employment Hamilton** reserves the right to add, modify or remove portions of this policy when deemed appropriate. The revision date is located on the bottom right corner, so you may confirm that you are familiar with the terms of the most recent update.

**February 14, 2011**