



ARCHDIOCESE OF REGINA

Policy Name:	Personal Information Protection	Number:	S5-2
Policy Type:	Personnel Records	Date Approved:	February 2017
Legislation:	<i>Income Tax Act</i> <i>Personal Information Protection and Electronic Documents Act (Canada) ("PIPEDA")</i>	Date Revised:	

Policy Statement: The Archdiocese of Regina is committed to preserving the privacy of its clergy, employees, parishioners, volunteers and confidential archdiocesan and parish information. This Policy Statement and Procedure applies to all employees, contractors, volunteers or anyone else who is granted access to personal, privileged and/or confidential information.

Definitions: “**Personal information**” means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization. {Personal Information Protection and Electronic Documents Act (Canada) PIPEDA }

“**Third party**” are individuals or organizations other than the subject of the records or representative of the Archdiocese of Regina. In certain circumstances, the Archdiocese of Regina may be entitled to provide personal information to an external party acting as an agent of the Archdiocese of Regina.

Responsibility:

- a) Employees are responsible for:
 - i. Keeping their own employee files current regarding name, address, phone number, dependents, etc.;
 - ii. Being familiar with and following policies and procedures regarding personal information;
 - i. Obtaining the proper consents and authorization proper to disclosure of personal, privileged and/or confidential information;
 - ii. Immediately reporting any breaches of confidentiality to their administrator;
 - iii. Ensuring the passwords used to access personal, privileged and/or confidential data are kept private and secure;
 - iv. Relinquishing any personal, privileged, confidential or client information in their possession before or immediately upon termination of employment.

- b) Administrators are responsible for:
 - i. Obtaining consent to the collection and use of personal information from employees;
 - ii. Ensuring policies and procedures regarding collection, use and disclosure of personal information are consistently adhered to;
 - iii. Responding to request for disclosure after the proper release is obtained;
 - iv. Obtaining from terminating employees prior to their termination any personal, privileged, confidential or client information in their possession;
 - v. Ensuring the disclosure of personal information to a Third Party is done in accordance with applicable legislative or regulatory regimes.

- c) Human Resources and/or Payroll personnel are responsible for:
 - i. Ensuring that appropriate consents have been obtained from employees with respect to the collection and use of personal information;
 - ii. Maintaining systems and procedures to ensure employee records are kept private;
 - iii. Obtaining the proper consents and authorizations prior to disclosure of information contained in employee records;
 - iv. Responding to employees' requests for access to their files;
 - v. Ensuring proper disposal of unnecessary files/information;
 - vi. Monitoring and responding to Third Party requests for personal information;
 - vii. Where collection, use or disclosure is permitted without prior consent, notifying individuals of the collection, use and disclosure of personal information after such occurrence.

Procedure:

Employee records:

- i. An employee's administrator, human resources and payroll personnel shall have access to employee records containing personal information. The administrator responsible for Human Resources will determine that such access is permissible and necessary. Personal information will not be disclosed outside of the organization without the knowledge and/or approval of the employee. Notwithstanding the foregoing, the Archdiocese of Regina will cooperate with law enforcement agencies and will comply with any court order or law requiring disclosure of personal information without the employee's consent.
- ii. A positive verification of employment will be given in the form of a confirmation of data with the employees consent.
- iii. An employee may request access to review their own file as per Policy S5-1: Employee Access to Employee Personal and Personnel Files.
- iv. Employee requests for disclosure of their own personal information to Third Parties must be accompanied by a completed, signed and dated Authorization to Release Personal Information (Appendix G) form.
- v. An employee's personal information will be retained after termination of employment for 99 years.