



## English Language Tutoring for the Ottawa Community *Volunteers Helping Newcomers*

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(Approved by the Board of Directors, January 27, 2020)

### **POLICY**

#### **Protection of Personal Information**

##### **Overview**

English Language Tutoring for the Ottawa Community (ELTOC) is a charitable organization committed to reaching out to adult newcomers who cannot attend regular English-language classes in Ottawa. ELTOC is funded by Immigration, Refugees and Citizenship Canada. Using the services of volunteer tutors recruited from the community, ELTOC provides one-on-one English-language tutoring in the newcomers' homes. Certified TESL teachers provide training, teaching materials and on-going support to ELTOC's volunteer tutors. ELTOC also has a program geared specifically to helping newcomers living in areas where volunteers are not available by organizing them into small groups that are taught by independent contractors who are certified TESL teachers.

##### **Policy**

This Policy applies to ELTOC and to any person providing services on ELTOC's behalf. Personal information shall be treated as confidential and not disclosed to any individual other than the individual whose information it is, except in accordance with applicable law.

ELTOC is committed to safeguarding the personal information entrusted to ELTOC by ELTOC learners, volunteers, independent contractors and employees. This means ELTOC will make every reasonable effort to keep all personal information in ELTOC's files accurate, confidential, secure and private.

In this context, personal information is defined as any factual or subjective information about an identified individual. Some examples are: name, age, sex, marital or family status, children, home address, telephone numbers, identifying numbers and educational history.

This Policy consists of eight principles that ELTOC will respect to protect any personal information in ELTOC's control, as follows:

##### **1. Purposes of collection**

ELTOC collects only the personal information necessary for its service delivery and administrative purposes, including for providing services to learners, and as permitted by law. Collection of personal information for service delivery purposes includes personal information needed to:



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- Enrol and process learners in preparation for receiving ELTOC tutoring services;
- Enrol and process volunteers in preparation for their volunteer activities with ELTOC;
- Recruit and on-board employees;
- Engage independent contractor services;
- Communicate with ELTOC's membership.

ELTOC collects personal information directly from prospective and current learners, and from volunteers, independent contractors and employees. ELTOC may also receive personal information from other organizations for service delivery purposes or as authorized by law.

### **2. Consent and disclosure**

ELTOC must ask for written consent to disclose personal information as relates to ELTOC learners, volunteers, independent contractors and employees, except in specific circumstances where disclosure without consent is authorized or required by law.

Consent may be refused, although there may be some instances where a decision to withhold consent will result in ELTOC's inability to provide its services. Also, consent may be withdrawn at any time subject to any legal requirements and reasonable notice.

When express consent for disclosure is required, ELTOC will provide a consent form for that purpose. The individual may also choose to permit another individual (i.e. an authorized surrogate such as a spouse, adult family member, friend) to sign on their behalf.

Concerns regarding the collection, use, retention and disclosure of personal information should be sent in writing to the ELTOC Executive Director who has the role of Privacy Officer (see below).

### **3. Limits to collection**

The amount and type of personal information collected by ELTOC is limited only to that which is necessary to fulfill the purposes identified. Collection must be proportional to the benefit of the services received by the learner from ELTOC. As much as possible and when reasonable, ELTOC will ask for the information it requires directly from each individual. Personal information will be collected using procedures which are fair, transparent and lawful.

### **4. Limiting use, disclosure and retention**

ELTOC will use personal information only for the purposes for which it was collected. Personal information will not be disclosed without each person's knowledge and consent, unless permitted or required by law (see above).



Personal information will be retained only as long as necessary to fulfill the purposes for which it was collected, and in compliance with any laws on information-retention. If all identified purposes for the use of personal information have been exhausted, ELTOC will destroy the information or render it unidentifiable.

#### **5. Accuracy**

In order to ensure reliable and timely services, ELTOC will make every reasonable effort to ensure that personal information is kept accurate, complete and up to date. If at any time personal information changes, ELTOC must be informed immediately. When new personal information and/or changes of personal information are provided, ELTOC will take reasonable steps to update and correct that personal information in ELTOC's possession.

#### **6. Safeguards**

ELTOC shall take all security measures reasonably necessary to protect any such personal information, using methods generally used by responsible organizations. ELTOC employs a number of safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Such safeguards include physical measures (such as locked filing cabinets, restricted access to offices and limiting access on a "need to know" basis, and use of computer passwords and encryption). ELTOC will ensure that these measures are communicated to all employees, volunteers and contractors to ensure compliance with this principle.

#### **7. Transparency**

ELTOC has easily understandable and readily available specific information about any policies relating to the management of personal information. This policy on Protection of Personal Information is available on ELTOC's website (provide link) under the section "About" by clicking on "Policies".

#### **8. Accountability**

Individuals have a right and responsibility to access their own personal information in any record or under the control of ELTOC. Upon request by the individual, ELTOC will provide that individual with any personal information ELTOC holds about them and will provide access to this information. In such instances, ELTOC will also indicate the purpose for which it is held or used, if applicable.

Individuals have a right to update any personal information held by ELTOC. Should anyone wish



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to see the full contents of their personal information in ELTOC's files, a written request must be made by mail or email addressed to: Giselle Leduc, Executive Director, ELTOC, 404 McArthur Street, Suite 108, Ottawa, Ontario, K1K 1G8. Telephone: 613 232-8566. Email: [admin@eltoc.ca](mailto:admin@eltoc.ca).

If, for any reason, there is concern about ELTOC's compliance with this policy, contact may be made with ELTOC's Executive Director (above) in her role as ELTOC's Privacy Officer. ELTOC will receive, investigate and respond to all individuals' written complaints and questions.

This Policy on Protection of Personal Information may be updated from time to time. Such changes will be posted to ELTOC's website.

This Policy was last revised in January 2020.