

EDMONTON YOUTH ORCHESTRA POLICIES, PRINCIPLES & PROCEDURES

PRIVACY AND DATA PROTECTION (Adopted September 13th, 2021)

POLICY STATEMENT:

The Edmonton Youth Orchestra (EYO) is committed to safeguarding the personal information entrusted by its members. Personal information is managed in accordance with Alberta’s *Personal Information Protection Act* and other applicable laws. This policy outlines the principles and practices followed in protecting personal information.

This policy applies to the EYO and its affiliates. A copy of this policy is provided to any member on request.

SCOPE:

This policy applies to the collection, use, retention and destruction of personal information (example, individual’s name, phone number, age, etc) collected by the EYO for the purpose of program administration.

INFORMATION COLLECTION:

Only personal information required for the purpose of providing services to the organization is collected. All records are maintained by the General Manager, unless otherwise indicated.

The information collected is as follows:

Collection Activity	Personal Information	Purpose
Membership Registration Form	Name of orchestra member Name of parent(s)/guardians(s) Date of birth of orchestra member Contact information (phone numbers, addresses, emails) of orchestra members and/or parent(s)/guardian(s) Name of orchestra member’s teacher	Contact list for communication purposes Determining membership eligibility and placement in appropriate orchestra Emergency contact information Historical records (names only)
Waiver Form	Name and contact information of orchestra member Alberta Health Care Number Emergency contact Medical conditions Date of birth	Emergency Communication Compliance with Orchestra Member Medical Policy
Personal Health Form	Name of orchestra member Health conditions	Emergency communication

	Medications	Ensuring the health and safety of orchestra members
Alumni List	Name of Alumni member OR name and contact information of Alumni member with approval	Historical records Communication purposes
Invoices/Contracts	Name and contact information of employee/contractor	Payroll Completion of income tax (T4, T4A's) Compliance with provincial and federal registrations
Resume or CV	Name and contact information of employee, contractor or potential board member ¹	Assessing or evaluating qualifications of potential employee, contractor, or board member
Vulnerable Sector Checks	Name, address, date of birth	Ensuring health and safety of orchestra members
Contractors / Employees / Sessional musicians	Name and contact information of contractor / employee / sessional musician Social Insurance Numbers	CRA tax purposes Historical records (names only)
Conducting Interns	Name and contact information of conducting intern Social Insurance Numbers	CRA tax purposes Historical records (names only)
Board Directors	Name and contact information of board directors Date of birth Employment information	CRA tax purposes AGLC reports Service Alberta annual returns Historical records (names only)
Scholarships >\$500	Name and contact information of scholarship recipient Social Insurance Number	CRA tax purposes
Charitable Donations	Name and contact information of donor	For issue of tax receipts
Web Mailing List	Name and email address of individual	Communication purposes
Audition List	Name and contact information of EYO applicant	Communication purposes
Instrument Loan Form	Name and contact information of orchestra member	For Instrument tracking and retrieval purposes
CD and/or Hoodie Order Form	Name of orchestra member	For distribution purposes

Personal information is normally collected directly from members. Information from other sources may be collected with consent and as authorized by law.

¹ Potential Board Member Resumes/CVs maintained by Nominating Committee

CONSENT:

Consent to collect, use, or disclose personal information is requested, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. Consent may be assumed in cases where information is required for legal purposes or where there is an obvious health requirement/benefit to the member.

Consent to continue to use and, where applicable, disclose personal information is also assumed where it has already been collected, for the purpose for which the information was collected.

Express consent is requested for some purposes. Some services may not be provided if the member is unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is required, members are normally asked to provide their consent orally (in person, by telephone), or in writing (by signing a consent form).

A member may withdraw consent to the use and disclosure of personal information at any time. EYO will respect their decision, but may not be able to provide certain services if the necessary personal information is not available.

DISCLOSURE OF PERSONAL INFORMATION:

Use and disclosure of member personal information is only done for the purpose for which the information was collected, except as authorized by law.

If there is a desire to use or disclose personal information for any new business purpose, member consent will be requested. Where use is allowed by law, consent may not be sought (e.g. the law allows organizations to use personal information without consent for the purpose of collecting a debt).

Personal employee and contractor information is collected, used and disclosed for the following purposes:

- Establishing training and development requirements
- Assessing performance and managing any performance issues
- Administering pay and benefits
- Processing employee work-related benefits and/or claims (e.g. workers' compensation, insurance, etc.)
- Complying with funding body requirements (e.g. AGLC casino licensing)
- Complying with applicable laws (e.g. Canada Income Tax Act, Alberta Employment Standards Code)

Only the specific information required to meet these purposes is collected. Personal employee or contractor information that may be collected, used and disclosed for these purposes are:

- Contact information, such as name, home address, telephone number
- Information from criminal background checks
- Employment or volunteer information such as:
 - resumes (including educational background, work history and references)
 - reference information and interview notes
 - letters of offer and acceptance of employment or acceptance of contract
 - policy acknowledgement forms
 - background verification information

- workplace performance evaluations
- emergency contacts
- Benefit information, such as forms relating to applications or changes to workers compensation, etc.
- Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers
- Other personal information required for the purposes of employment, whether it be for a contractor, direct employee or volunteer

Employee(s), contractor(s), members, and volunteers will be informed of any new purpose for which personal information will be collected, used, or disclosed with consent obtained prior to, or at the time the information is collected.

Consent will be obtained to collect, use and disclose personal information for purposes unrelated to the employment or volunteer relationship.

EYO does not to disclose personal information about employees, contractors, members or volunteers in response to reference requests without consent. The personal information normally provided in a reference includes:

- Confirmation that the individual was an employee, contractor, member or volunteer, including the position, term of employment / contract / membership / volunteering
- General information about an individual's job duties and information about the employee, contractor, member or volunteer's ability to perform said job duties, including degree of success in the employment or volunteer relationship

SAFEGUARDING PERSONAL INFORMATION:

Every reasonable effort is made to ensure that personal information is accurate and complete. EYO relies on individuals to notify the organization of any changes to personal information which may affect their relationship with the organization, as well as any known personal information errors.

Personal information is protected in a manner appropriate for the sensitivity of the information. Every reasonable effort is made to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

Appropriate security measures are used when destroying personal information.

Security practices include:

- Cross-shredding of paper files before disposing
- Locking file cabinets when unattended
- Password protection of computers and/or files to limit access to information about members, employee(s), contractor(s), and volunteers
- Keeping firewalls and anti-virus software up-to-date to protect against invasive malware
- Permanently deleting electronic records, as necessary
- Limiting access to personal information. The General Manager, and Board President as backup, are the only individuals with access to EYO office computer passwords and who have key access to EYO file cabinet(s)
- Only collecting that information which is ultimately needed
- Collecting sensitive information in person or by phone

PERSONAL INFORMATION RETENTION:

Personal information is retained only for as long as is reasonable in order to fulfil the purposes for which the information was collected, or for legal or business purposes

Retention guidelines are as follows:

Information Type	Retention Period	Reason for Retention	Review Date	Destruction Date
Membership Form	36 months	Communication	Annually	36 months after submission
Audition List	36 months	Communication Track audition history	Annually	36 months after audition date
Membership List	36 months	Communication	Annually	36 months
Alumni Lists	Indefinite with alumni member approval	Communication	Annually	n/a
Wavier/Consent Form and Personal Health Form	Till end of EYO season	Communication	Annually	End of EYO season
Vulnerable Sector Checks (VSC)	24 months from date issued	EYO Policy requires renewal every 2 years	Annually	24 months from date issued
Employment Contract	36 months from date of termination of employment	Alberta Employment Standards requirement	Annually	36 months from date of termination of employment
Employment Records	Indefinite	Historical reference	Annually	n/a
T4, T4As, Charitable Returns	6 years from the end of the last tax year to which they relate	CRA retention requirements	Annually	6 years from the end of the last tax year to which they relate
Board List	12 months past end of board term	Communication CRA, Service Alberta and AGLC requirements	Annually	12 months past end of board term
Scholarship Recipient List	12 years	Scholarship tracking Tax purposes	Annually	12 years past issue of scholarship
Charitable Donation Receipts	24 months after the end of the year in which the donation was made	CRA, tax purposes	Annually	24 months after the end of the year in which the donation was made

Web Mailing List	Indefinite with individual's approval	Communication	Annually	n/a
Instrument Loan Form	Till return of instrument	Tracking and communication	Annually	On return and inspection of instrument
CD/Hoodie Order Form	Till end of season	Verification of order	Annually	End of EYO season

ACCESS TO RECORDS CONTAINING PERSONAL INFORMATION:

Individuals have the right to access their own personal information in a record that is in the custody of, or under the control of, the Edmonton Youth Orchestra, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual.

Where EYO refuses a request, in whole or in part, reasons for the refusal will be provided. In cases where exceptions to access apply, EYO may withhold some information providing partial access to a record.

Individuals may make a request for access to their personal information by submitting a written request to the General Manager. There must be sufficient information in the request to allow identification of the information being requested.

Information may be requested about the EYO's use of an individual's personal information and any disclosure of that information to persons outside the EYO. In addition, a correction of an error or omission in an individual's personal information may be requested.

Requests will be responded to within 30 calendar days, unless an extension is granted. EYO may charge a reasonable fee to provide information, but not to make a correction. Fees are not charged when the request is for personal employee information. The requestor will be advised of any fees that may apply before the request is processed.

QUESTIONS AND COMPLAINTS:

Any questions or concerns about collection, use or disclosure of personal information by the Edmonton Youth Orchestra, or requests for access to an individual's own personal information are to be directed to the General Manager.

Where disagreement exists with responses received, a "request for review" or "privacy complaint" can be submitted to the Information and Privacy Commissioner (Edmonton):

Office of the Information and Privacy Commissioner (Edmonton)
 #410, 9925 - 109 Street NW
 Edmonton, AB T5K 2J8
 Phone: (780) 422-6860
 Toll-Free: 1-888-878-4044
 Email: generalinfo@oipc.ab.ca Website: www.oipc.ab.ca

POLICY REVIEW PROCEDURE:

This Policy document will be reviewed annually by the Board at the first meeting after the Annual General Meeting, or more frequently as required due to feedback from Board members, the General Manager or the Music Director

- The President will co-ordinate any reviews and proposed changes
- The Board may change this policy at any time at their discretion
- Any Board member, the General Manager or the Music Director may initiate a Board discussion of this policy at a Board meeting or ask to include it on the meeting agenda.

POLICY REVIEW DATE: September 13th, 2021

EFFECTIVE DATE: September 13th, 2021

REVISION HISTORY:

CONNECTION TO BOARD POLICIES: EYO policies will be reviewed annually by the EYO Board.