

PRIVACY POLICY
(Policy of collecting information)

This privacy statement applies to personal information about the employees, children in our care, their parents/legal guardians, their siblings, and other individuals who are involved in their care. We are committed to protecting the privacy of our employees, children in our care and their families as well as collecting, using and disclosing the personal information responsibly.

Personal information is only collected, used and disclosed in accordance with this Privacy Policy. All staff members who come in contact with your personal information are aware of the sensitive nature of the information that you have disclosed.

The purpose of this Privacy Statement is to inform you as parents/guardians as well as employees about our practices related to the collection, use and disclosure of personal information, which may be collected by us through your filling out our forms or otherwise providing information through participation in our programs.

Knowledge and Consent

Providing us with the requested personal information by **filling out the forms**, either yourself or on behalf of your child and/or **enrolling your child** in our child care program and/or by **accepting employment** in our organization, **you consent** to the collection, use and disclosure of your personal information as defined and, if applicable, the personal information of your child in accordance with the following terms and conditions.

We may imply your consent if we feel we are using your personal information for purposes that are obvious to you.

If we will be using or disclosing personal information for purposes that have not been stated in this statement and that we do not feel would be obvious to you, we will first obtain your expressed consent.

With written notice you may withdraw, or restrict/limit, your consent at any time, subject to legal or contractual restrictions and reasonable notice.

However, please note, that due to our statutory and regulatory obligations withdrawing consent may affect our ability to continue to provide you with the services you have or would like to receive.

Addendum to Parent Handbook

Casa Vera Montessori School
2000 Keele Street, Toronto, ON M6M 3Y4

Privacy Policy
Page No.2/6

In certain circumstances, personal information can be collected, used or disclosed without the knowledge and consent of the individual (or his/her parents/legal guardian). For example:

- If it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill or mentally incapacitated.
- If seeking the consent might defeat the purpose for collecting the information, as in the context of an investigation of a breach of an agreement or a contravention of a federal or provincial law; or
- If there is an emergency where the life, health or security of an individual is threatened

Defining Personal Information

For the purposes of this policy, personal information includes any factual or subjective information, recorded or not, about an identifiable individual.

This includes, but is not necessarily limited to information in any form such as contact details, health information, living arrangements, background information, the child's personal characteristics and behaviour styles, marital status, family status, education, medical and immunization history, criminal record, employment history, address, telephone number and any numerical identification such as Social Insurance Number and so on.

Personal information **also includes** information that may relate to the work performance of the individual, any allegations, investigations or findings of wrongdoing, misconduct or discipline.

Personal information **does not** include the name, job title, business contact information or job description of employees of an organization.

Why we collect personal information

We collect information as a requirement of the Child Care and Early Years Act, 2014 as enforced by the Ministry of Education.

We are committed to provide best possible, dependable and inclusive child care as well as support and information services to meet the diverse child care needs. The information is collected to assist us in screening potential employees and volunteers and to aid us in providing a safe, stimulating and supportive environment for employees, families and their children.

Addendum to Parent Handbook

Casa Vera Montessori School
2000 Keele Street, Toronto, ON M6M 3Y4

Privacy Policy
Page No.3/6

In order to meet these goals, we **collect, use and discloses** personal information **for the following purposes:**

- to identify the children in our care and their families
- to determine eligibility for our program and services
- to assess the needs of each child and to ensure that these unique needs are met
- to monitor and ensure the health, safety and well being of all children who are in care in our program
- to monitor developmental levels, skill acquisition and special needs of the children in our care
- to establish a culturally sensitive and developmentally appropriate program for the children in our care
- to understand the desires, concerns and opinions of the children in our care and their families
- to establish and maintain good relationships with the children in our care and their families
- to provide the responsible child care services expected of a licensed child care program to the children in our care and their families
- to administer our programs and services (e.g. time sheets, attendance, reports, accountability etc)
- to ensure timely communication between parents/guardians and our staff
- for the collection of statistics as may be required
- to meet the record-keeping obligations required by the province of Ontario, the City of Toronto and Canada Customs and Revenue Agency
- to provide families with information and referrals to community support services in Toronto
- to communicate with other services in regards to child's care
- for the purposes of an audit of Casa Vera Montessori School
- to comply with the general law
- for the purpose of providing income tax statements
- to manage and enhance our business and operations
- to meet legal and regulatory requirements, such as those contained in the Child Care and Early Years Act, and it's associated Regulations

How We Use Your Personal Information

We use personal information to ensure the safety of children in its care and that of our employees, students and volunteers. Contact information is used to facilitate communication and to ensure that parents or emergency contacts can be reached as necessary. We also issue reminders and important updates through our e-mail distribution list.

Addendum to Parent Handbook

Casa Vera Montessori School
2000 Keele Street, Toronto, ON M6M 3Y4

Privacy Policy
Page No.4/6

We use information about skills, employment history, records/reference checks, etc. to employ the best suitable candidates.

From time to time we may review your personal information to identify candidates to approach regarding specific volunteer opportunities.

We use health information to help ensure the most appropriate response to any health care situation that may arise.

Financial information is only used for the purpose of collecting fees and/or paying wages and submitting government remittances.

We maintain files with your information. Only staff with a legitimate need to access this information has access to these files.

When We Disclose Your Personal Information and to whom

We do not disclose personal information to individuals, organizations or corporations outside of our organization at any time or for any reason, except with the consent of the individual or as required by law. Personal information is never traded, sold or leased by us to any external companies

We may share personal information with a third party engaged to assist us in providing services to parents/guardians or to carry out one or more of the purposes described above (e.g., auditor, health unit, a collections agency). These service providers are prohibited from using such personal information for any purpose other than to provide this assistance and are required to protect personal information disclosed by us and to comply with the privacy legislation.

We reserve the right to disclose personal information to a third party if a law, regulation, search warrant, subpoena or court order legally requires us to do so.

We may disclose personal information to a third party where the individual (or his/her parent/legal guardian) has consented to such disclosure.

We may disclose personal information, **without parental/individual consent**, to:

- Public Health
- Ministry of Education/ officials delegated with the authority
- Authorities vested in provincial or federal statutes
- City of Toronto Childcare Programs
- Therapists, volunteers, students on placement at our centre

Addendum to Parent Handbook

Casa Vera Montessori School
2000 Keele Street, Toronto, ON M6M 3Y4

Privacy Policy
Page No.5/6

- Educational or regulatory observers and other service providers on an as-needed basis in order for them to assist us in managing, providing or evaluating our child care services and program; an agent of a public authority (such as the Children's Aid Society) if, in our reasonable judgment, it appears that there is imminent danger to life or property, which could be avoided or minimized by the disclosure of the information
- A third party with whom we are negotiating in order for them to take over some or all of our services and/or other activities
- the courts (following a warrant or a court order)
- the office of the Ombudsman
- Coroner's Office

When sharing personal information we release limited information as required for the function that will be performed by the representative on our behalf. We also ensure that every representative is clear on their obligation to protect personal information and only use the information for the purpose(s) for which it is being provided.

How We Protect Your Personal Information

The right of every child, family and staff member to privacy is recognized and protected to the greatest extent possible.

We are committed to ensuring that personal and health information are protected and we have procedures in place to ensure that personal information, in both paper and electronic format, are protected against the risk of loss, theft, unauthorized access, disclosure, copying, modification or destruction.

The access to your personal information is restricted to select employees, there is limited access to offices where information is stored, filing cabinets are locked and we use individual passwords to protect electronic information.

All our employees and independent contractors are subject to our procedures regarding the confidentiality and security of information.

Each teacher, student and/or volunteer is expected to sign a **Confidentiality Agreement** that remains on their individual file records.

How Can You Access Your Personal Information and Check Its Accuracy

We rely on the information provided by you when enrolling your child(ren) in our child care program or when beginning employment. You may at any time make a

Addendum to Parent Handbook

Casa Vera Montessori School
2000 Keele Street, Toronto, ON M6M 3Y4

Privacy Policy
Page No.6/6

request for access to your or your child's personal information. Personal information will be provided within a reasonable time. We have the right to charge a reasonable fee should you request copies of your personal information or extensive search/work is involved.

However, in certain situations we may not be able to provide access to all of the personal information we hold about an individual as there are numerous exceptions to the access principle under the Personal Information Protection & Electronic Documents Act (PIPEDA). For example we cannot provide access to personal information about another individual if they have not consented, or to information that could reasonably be expected to threaten the life or security of another individual. Also we cannot provide access to information that was generated in the course of the formal dispute resolution process. If we are unable to provide you with all the information contained in your child's file, we will let you know.

We strive to maintain accurate records of your personal information; however, this can not be achieved without your help. In this ongoing effort, **we ask you to provide us with up-to-date information** as changes arise. Let us know of any personal information you have given to us in the past that is incomplete, inaccurate, or no longer relevant or of any new issues or information that will help us in caring for your child.

How Long is Your Information Retained

We retain personal information only as long as it remains necessary or relevant for the identified purposes, and in accordance with legal requirements. Therefore we will retain your child's file or personnel file for as long as you remain involved with the organization and for a fixed period of time required by respective legislation.

We securely destroy personal information after retaining them for fixed period of time required by respective legislation.