

## POL013

# Employee Personal Information Protection

The printed copy of this document may be superseded without notice.

Please refer to the on-line electronic version on the Canadian Blood Services Intranet for the most current version.

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## Purpose

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The purpose of this policy is to govern the collection, use, retention and disclosure of employee personal information by Canadian Blood Services.

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## Policy

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Canadian Blood Services shall:

- Collect, use, disclose and retain employee personal information in compliance with privacy legislation and good privacy practices.
- Identify the purposes for which employee personal information is collected and limit collection to that which is necessary for the identified purposes.
- Collect, use, disclose and retain employee personal information without the consent of the employee for purposes that are reasonable for establishing, managing or terminating the employment relationship. When determining the requirement for employee consent, Canadian Blood Services takes into account the sensitivity of the personal information.
- Collect employee personal information from other sources such as previous employers, employment agencies, service providers and other parties to whom the employee has given permission to disclose the information.
- Conduct background and criminal record checks for prospective and current employees where required as a condition of employment or by law.
- Grant access to or disclose employee personal information only for the identified purposes, unless the employee provides written consent, the disclosure is authorized by law, is in accordance with a collective agreement, or as otherwise set out in this policy, subject to Canadian Blood Services' legal rights and obligations in connection with the information.
- Publicly disclose the name, title and salary of any employee who earns \$100,000 per year or more.
- Not disclose employee personal information that reveals personal information about a third party, or information generated in the course of a formal dispute resolution process, unless required by law.
- Retain employee personal information in accordance with approved records retention schedules.
- Take reasonable measures to ensure that employee personal information is accurate and complete, and implement measures to ensure its confidentiality and integrity.
- Restrict access to employee personal information to those authorized individuals who require the information to perform their job functions.

## **Policy Scope**

This policy applies to any business area of Canadian Blood Services that maintains custody or control of employee personal information. This policy does not apply to the personal information of employees in their capacity as blood, stem cell, organ or tissue registrants, donors or recipients.

## **Roles and Responsibilities**

The **Chief Privacy Officer** is responsible for developing, implementing and maintaining operational policies, processes and practices to give effect to this policy; and for ensuring practices are in place to address concerns or complaints regarding Canadian Blood Services' collection, use, retention or disclosure of employee personal information.

**Management** is responsible for ensuring that appropriate physical, technical and administrative controls are in place for safeguarding employee personal information in their business areas; for promoting privacy awareness; reporting privacy-related concerns and issues to the Privacy & Access to Information Office; and for ensuring that all new employees receive privacy and access to information training.

All **Employees** are responsible for adhering to policies and procedures for the collection, use, retention and disclosure of employee personal information, for reporting privacy-related concerns and issues to management and for accessing only the employee personal information required to perform their job functions.

## **Compliance**

Failure to comply with this policy, including the unauthorized access, use, disclosure, modification or destruction of employee personal information may result in disciplinary action, up to and including termination of employment, as determined by Canadian Blood Services.

## **Definitions**

**Employee** means an individual who is a prospective, current or former employee of Canadian Blood Services and includes an individual who performs a service for, or in relation to, or in connection with, the organization as a volunteer or student, or under a contract or an agency relationship with the organization.

**Employee personal information** is information that is collected, used or disclosed solely for the purposes reasonably required to establish, maintain, manage or terminate an employment relationship between an employee and Canadian Blood Services. Such information may include: recruitment and offers of employment; salary and rates of pay; pension and benefits; performance management; disciplinary action; leave; occupational and non-occupational injury, illness and disability; promotions; reclassification; employment termination; and retirement. It may also include information such as an employee's home address, personal contact information, educational and employment history.

Employee personal information does not include work contact information or work product information.

**Work contact information** is information that allows an individual to be contacted at work. It includes the employee's name, position title, business telephone number, business address, business e-mail and business fax number.

**Work product information** is information that is prepared or collected by an employee as part of his or her work responsibilities, but does not include information about an individual who did not prepare or collect the information.

**References**

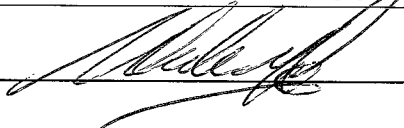
Access to Information (ATI) Guidelines

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**Approval**

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Approved By: \_\_\_\_\_



Approver Name and Title: Watson Gale, Vice President, General Counsel & Corporate Secretary

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