



PRIVACY POLICY



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PRIVACY POLICY

1.0 Purpose of OCA Privacy Policy

The OCA is a voluntary, non-profit organization that draws its membership from camps, individuals and like-minded organizations and agencies, all devoted to maintaining high standards for organized camping, and to sharing information and ideas that maintain these standards.

After 77 years of service with summer camps for children the Ontario Camps Association (OCA) has played an important leadership role in promoting and encouraging children and youth camping in Ontario. OCA activity takes a number of different forms:

Education: The OCA sponsors and supports a wide range of activities which ensure a vital exchange of information between camping professionals. These include training seminars for camp staff, and events sponsored by the OCA's many standing committees. Perhaps most noteworthy among these events is our Annual Conference, which draws together hundreds of camping professionals from across Ontario, Canada, and the world, to meet, listen, learn, and share ideas, stories, advice, and experiences.

Standards: Camping professionals exchange information and ideas during OCA Standards visits. These visits, which form the core of the OCA's accreditation program, ensure that high standards of practice are in place at all OCA member camps.

Camp membership in the OCA is not automatic: any camp seeking OCA accreditation must undergo a two-year provisional period, during which time it is visited by OCA representatives each year, and must meet our standards before being accepted for full membership. Once a camp achieves full membership, it receives a visit every four years, or the year following a change of site, ownership or director. Our camps voluntarily adhere to over 400 separate standards dealing with all aspects of a camp's operation: health & safety, leadership, food service and maintenance, staffing, programming, and administration.

The OCA Standards Committee regularly reviews and revises standards when appropriate.

Informing the Public: The OCA is dedicated to informing families, schools, media, social welfare agencies, and other members of the public about the benefits of camping and the role the OCA plays in ensuring safe, fun, exciting camping for all of Ontario's children and youth.

We provide information to the public through our brochures, our website, our search engine and our annual Camping Guide. We also work to provide the public with information and camp connections through camp fairs. The OCA also advocates on behalf of the public to the camping community, responding to concerns raised by parents and campers.

This privacy policy has been developed in accordance with Canada's *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). PIPEDA sets out rules for the collection, use and disclosure of personal information in the course of commercial activity as defined in the Act.

1.1 The Ten Principles of PIPEDA Summarized

The ten principles of *PIPEDA* that form the basis of this Privacy Policy are as follows:

1. **Accountability:** organizations are accountable for the personal information they collect, use, retain and disclose in the course of their activities, including, but not limited to, the appointment of a Chief Privacy Officer (for OCA, this is the Executive Director);
2. **Identifying Purposes:** organizations are to explain the purposes for which the information is being collected at the time of collection and can only be used for those purposes;
3. **Consent:** organizations must obtain an Individual's express or implied consent when they collect, use, or disclose the individual's personal information;
4. **Limiting Collection:** the collection of personal information must be limited to only the amount and type that is reasonably necessary for the identified purposes;
5. **Limiting Use, Disclosure and Retention:** personal information must be used for only the identified purposes or as required by law, and shall be retained only as long as necessary for the fulfillment of those purposes;
6. **Accuracy:** organizations are required to keep personal information as accurate, complete and up-to-date as is necessary for the purposes for which it is used;
7. **Safeguards:** organizations are to use appropriate safeguards, including physical, organizational and technological measures, to protect personal information from unauthorized access or disclosure.
8. **Openness:** organizations must inform their clients and train their employees about their privacy policies and procedures;
9. **Individual Access:** an individual has a right to access personal information held by an organization and to challenge its accuracy and completeness if need be; and
10. **Provide Recourse:** organizations are to inform clients and employees of how to bring a request for access, or complaint, to the Chief Privacy Officer, and respond promptly to a request or complaint by the individual.

This Privacy Policy applies to OCA 's Board of Directors, Committee Members, volunteers, and to OCA employees and contracted employees.

1.2 Definitions

"*Personal information*" means any information about an identifiable individual. It includes, without limitation, information relating to identity, nationality, age, gender, address, telephone number, e-mail address, Social Insurance Number, date of birth, marital status, education, employment health history, assets, liabilities, payment records, credit records, income and information relating to financial transactions as well as certain personal opinions or views of an Individual.

"*Business information*" means business name, business address, business telephone number, name(s) of owner(s), officer(s) and director(s), job titles, business registration numbers (HST, RST, source deductions), financial status. Confidentiality of business information will be treated with the same way as is required for individual personal information.

"*Individual*" means Individual or Honorary Life Member.

"*Member*" means an individual person, a camp (day or residential with specifications for membership), a vendor with specifications for membership) and an organization that is affiliated with the OCA.

"*Board Member*" means an individual member who volunteers on the OCA Board of Directors in the capacity of President (1), Secretary/Treasurer(1), Past-President (1), Vice-President (2), Director of one of the following Sub-classes (4) – Agency, Religious, Special Needs, Day and Residential Camp and Member-at-Large(2).

"*Committee*" means a Standing Committee or an ad hoc committee that is established from time to time.

"*Committee Member*" means an individual who is a volunteer and who is a chair of a committee or a member of a committee who may or may not be an OCA Member.

"*Registration*" means the registration form or related forms completed by a member(s) for OCA educational programs

"*Database*" means the list of names, addresses, telephone numbers, and descriptive camp information or business information of members of the OCA, including: computer files, paper files, and files on computer hard-drives.

"*File*" means the information collected in the course of processing an application, as well as information collected/updated to maintain /service the member.

"*Express consent*" means the individual completes the application or other forms containing personal information, authorizing OCA to collect, use, and disclose the individual's personal information for the purposes set out in the application and/or forms.

"*Implied Consent*" means the organization may assume that the individual consents to the information being used, retained and disclosed for the original purposes, unless notified by the individual.

"*Third Party*" means a person or company that provides services to OCA in support of the programs, benefits, and other services offered by OCA.

2.0 Purposes of Collecting Personal Information

Personal information is collected to provide membership benefits on the website, in the OCA Camp Guide, for Educational Programs and for Employment of OCA Staff and Volunteers. The individual is the main source of information.

Only that information required for membership, educational programs, for the OCA Camps Guide or for staff or volunteer employment, will be collected. Employee's Social Insurance Number, Birth Date and contact information will be requested once employment is confirmed.

3.0 Consent

An individual's express consent will be obtained before or at the time of collecting personal information. The purposes for the collection, use or disclosure of the personal information will be provided to the individual at the time of seeking his or her consent in the form completed or by reference to this policy. Once consent is obtained from the individual to use his or her information for those purposes, OCA has the individual's implied consent to collect or receive any supplementary information that is necessary to fulfill the same purposes. Express consent will also be obtained if, or when, a new use is identified.

By completing an application and/or other forms, consent is granted by the individual to use and disclose the information for the purposes identified by the form or in this policy.

This Privacy Policy does not cover statistical data from which the identity of individuals cannot be determined. OCA retains the right to use and disclose statistical data as it determines appropriate.

4.0 Limiting Collection

Personal information collected will be limited to the purposes set out at the time of collection and in this Privacy Policy, OCA membership renewal forms, and/or other educational registration forms.

5.0 Limiting Use, Disclosure and Retention

5.1 Use of Personal Information

Personal information will be used for only those purposes to which the individual has consented or as required by law:

Personal information may also be used by OCA for purposes of maintaining or improving the services that it provides to its members.

OCA will use personal information *without* the individual's consent, where:

- an emergency exists that threatens an individual's life, health or security; and
- the information is publicly available.

5.2 Disclosure and Transfer of Personal Information

Personal information will be disclosed to only those OCA Employees, Volunteers, members of OCA Committees, and the Board of Directors that need to know the information for the purposes of their work.

OCA retains third party companies to provide services to OCA including membership and registration services, including third party companies operating in the United States of America [NTD – Is this an accurate description of how third parties are used?] OCA will transfer personal information as required for the purpose of those services to the third party companies. The third party companies are required to sign confidentiality agreements before any personal information is transferred.

OCA will *disclose* personal information to third parties, *without* an individual's knowledge, as required by law including :

- comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction;
- a law enforcement agency with appropriate legal authority in the process of a civil or criminal investigation; or
- a government agency or department with legal authority to the information.

5.3 Retention of Personal Information

Personal information will be retained in members' files as long as the file is active and for such periods of time as may be prescribed by applicable laws and regulations.

A file will be deemed inactive if the member or registrant for educational programs terminates their membership or registration. Information contained in an inactive file will be retained for a period of seven (7) years.

6.0 Accuracy

OCA endeavours to ensure that any personal information provided by a member or individual in their file(s) is accurate, current and complete as is necessary to fulfill the purposes for which the information has been collected, used, retained and disclosed. Individuals are requested to notify OCA of any change in personal or business information.

7.0 Safeguards

Organizational Safeguards: Access to personal information will be limited to OCA Staff, and/or the Executive Director. Personal information provided to members of OCA committee(s) will be limited to only that information required to carry out the mandate of that committee. Members of the OCA Committee(s), Board of Directors and Volunteers are not permitted to copy or retain any personal information and must return for destruction all such information given to them to review once the purpose for being provided with this information has been fulfilled.

Physical Safeguards: Active files are stored in locked filing cabinets when not in use. Access to work areas where active files may be in use is restricted to OCA employees.

All inactive files or personal information no longer required are shredded prior to disposal to prevent inadvertent disclosure to unauthorized persons.

Technological Safeguards: Personal information contained in OCA computers and electronic databases is password protected. Access to any of the OCA 's computers also is password

protected. OCA 's Internet router or server has firewall to protect personal and confidential business information against virus attacks and "sniffer" software arising from Internet activity.

8.0 Openness

OCA makes its privacy policies and procedures known to the members and the public via this Privacy Policy. This document is available on request and on OCA's website:
www.ontariocamps.ca

9.0 Individual Access

A member or individual who wishes to review or verify their own personal information held by OCA may make the request for access, in writing, to the OCA 's Executive Director. Upon verification, the Executive Director will respond within 60 days.

If the individual finds that the information held by OCA is inaccurate or incomplete, upon the individual providing documentary evidence to verify the correct information, OCA will make the required changes to the member's or individual's file(s) promptly.

10.0 Complaints/Recourse

If an individual has a concern about OCA 's personal information handling practises, a complaint, in writing, may be directed to the OCA's Executive Director.

Upon verification of the individual's identity, the OCA's Executive Director will act promptly to investigate the complaint and provide a written report of the investigation's findings to the Board of Directors for discussion and processing.

Where OCA 's Executive Director makes a determination that the individual's complaint is well founded, the Executive Director will take the necessary steps to correct the information handling practise and/or revise OCA 's privacy policies and procedures.

Where OCA 's Executive Director determines that the individual's complaint is *not* well founded, the individual will be notified in writing.

Questions/Access Request/Complaint

Any questions regarding this or any other privacy policy of OCA may be directed to the Executive Director. Requests for access to information, or to make a complaint, are to be made in writing and sent to the Executive Director at the address below:

Executive Director
Ontario Camps Association
301-250 Merton Street
Toronto, Ontario
M4S 1B1

Email address: info@ontariocamps.ca