

ISANS Client Privacy Policy

Immigrant Services Association of Nova Scotia (ISANS) is committed to ensuring that any personal information collected from clients during the course of ISANS administration and client service delivery is protected.

This Privacy Policy outlines the principles by which ISANS protects all client personal information collected and is in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA), (www.priv.gc.ca/leg_c/leg_c_p_e.asp)

Page 4 of this document is included on behalf of the Nova Scotia Office of Immigration and your signature is required by them to prove you have read the page.

Summary of Principles:

1. **Accountability** – ISANS is responsible for the personal information under its control and ISANS leadership team is responsible for overseeing compliance by their staff to PIPEDA. This includes personal information transferred to third parties for processing or for providing ongoing services to clients.
2. **Purposes for collection** - ISANS identifies and communicates the purpose for which personal information is being collected from clients at or before the time the information is requested. ISANS will collect, use and disclose personal client information for the following purposes:
 - To review and process client registrations
 - To develop aggregate information and statistics used for monitoring and evaluation of the overall success of Programs and Services and to identify service areas to improve upon.
 - To create and maintain the ISANS client databases.
 - To identify and select services and service providers to meet client needs or preferences.
 - To comply with legal requirements.
 - To comply with funder requirements. ISANS programs and services are funded by both the provincial and federal governments and we are required to collect certain pieces of information from all clients to share with the provincial and federal government. The personal information collected by ISANS will only be used and disclosed in keeping with PIPEDA, the Personal Information Protection and Electronic Documents Act and where collected and passed to funders the Nova Scotia Freedom of Information and Protection of Privacy Act (<http://novascotia.ca/just/iap/>) and the Nova Scotia Personal Information International Disclosure Protection Act (<http://nslegislature.ca/legc/statutes/persinfo.htm>), will apply.
3. **Consent** - ISANS will obtain client consent, either expressed or implied, before or when it collects, uses or discloses personal information, except where authorized by law.

Expressed consent is consent that has been clearly established between the ISANS employee and the client and can be verbal or in writing.

Implied consent is consent which is inferred from a client's actions and the facts and circumstances of a particular situation.

- The express, written consent of a client will be required before ISANS shares personal client stories and photographs on our website or through on-line or hardcopy publications including the ISANS Annual Report.
- When an individual is registered as an ISANS client they complete the Client Registration Form and are required to read the following statement and provide their written express consent accordingly.

‘For us to support you in your settlement process, we are required to share information with other organizations especially our funders.

By saying “YES” to the following, we have your permission to share your information with funders and third party organizations assisting with your settlement. Is it ok to share your information? YES / NO

- A client can refuse to provide their consent to ISANS collecting their personal information and the implications of that refusal on the services ISANS can provide will be explained to them at the time.
 - Consent to share personal information can be withdrawn by a client at any time by notifying ISANS at info@isans.ca and allowing 5 business days for processing.
 - In the case of any ISANS client under 19, their parent or guardian will be asked to provide express written consent on their behalf.
4. Limiting collection - ISANS makes every reasonable effort to limit the collection of personal information to that which is necessary for the purposes identified by ISANS.
 5. Limiting use, disclosure and retention - ISANS makes every reasonable effort not to use or disclose personal information for purposes other than those for which it was collected, except with the consent of the client, or as required by law. ISANS will use contractual or other means to protect personal information that has been transferred to ISANS partner organizations and client service providers. A client may, at any time, request or be given an explanation of how their personal information is being used by contacting info@isans.ca .

6. Maintaining accuracy - ISANS will keep personal information as accurate, complete and up-to-date as reasonably possible. Clients are responsible for advising ISANS of any changes to their personal information, for example, home address or contact information.
7. Safeguards and Security - ISANS will use appropriate security safeguards to protect client personal information against loss, theft, unauthorized access, disclosure, copying, misuse or modification, regardless of the format in which the information is held.
All client personal information is accessible only by authorized ISANS personnel, or authorized Settlement Online service providers, who need access to client information for the performance of their duties or provision of services to ISANS clients.
8. Transparency - ISANS Client Privacy Policy is available on our website, is shared with all new clients and can be requested at info@isans.ca .
9. Access to personal information - Upon receiving a written request from a client, and subject to exemptions stipulated by law, ISANS will inform a client of the existence, use and disclosure of their personal information and will provide access to that information. A client will be entitled to challenge the accuracy and completeness of the information and have it amended where inaccuracies exist.
10. Complaints Process - An ISANS client can raise any concerns they may have with the protection of their personal information by following the ISANS Client Complaint Process and/or emailing info@isans.ca .
11. Sharing personal information without client's consent - There are situations where ISANS does not need the consent of a client in order to share their personal information. The exceptions are:
 - Section 23 of the Children and Family Services Act states that “Every person who has information, whether or not it is confidential or privileged, indicating that a child is in need of protective services shall report that information to an agency.”
 - Section 5 of the Adult Protection Services Act provides that “anyone who has information, confidential or privileged, indicating that an adult is in need of protection must report that information to the Minister of Community Services through designated officials.”
 - If you pose a threat of harm to yourself or to another person, ISANS will take whatever steps are required by law, or permitted by law, to help prevent any potential harm from happening.
 - A court order, issued by a judge, could require ISANS to release your personal information or could require an ISANS employee or volunteer to testify in court.
12. Amendments to this Privacy Policy - Notification of any changes to ISANS Privacy Policy will be posted on ISANS website.

Please read the following information from the NS Office of Immigration and sign below to prove your understanding of the contents of this page:



Service Registration Intake Form IMMIGRANT SERVICES ASSOCIATION OF NOVA SCOTIA (ISANS)

COLLECTION, USE, & DISCLOSURE OF PERSONAL INFORMATION

The Nova Scotia Government Labour Market Programs provided by the Departments of Labour and Advanced Education, Community Services, and the Office of Immigration, are bound by the principles and requirements of the Nova Scotia Freedom of Information and Protection of Privacy (FOIPOP) Act. The FOIPOP Act defines the meaning of personal information; in addition to the information defined by the Act, other types of personal information may include: date of birth, Internet Protocol address, e-mail address, or other information collected by our programs or services.

The personal information collected will only be used and disclosed in keeping with the access and privacy provisions of the Nova Scotia FOIPOP Act and the Nova Scotia Personal Information International Disclosure Protection (PIIDA) Act. Any personal information collected during the course of accessing our programs or using our services is used only for providing you with services; for example, for registration to our programs or for determining your eligibility to services etc.

We do not disclose your personal information to other organizations or individuals except as required to fulfill the purpose(s) of the program or service and only to the extent required or authorized by law.

Some functions within these programs or services are provided by service providers external to the department(s). All external service providers that provide you with services on our behalf must comply with our privacy requirements and must meet the applicable security, privacy and terms of use provisions.

Under the privacy provisions of the FOIPOP Act individuals have the right to correction of, and access to, their personal information. To obtain access or request correction of your personal information please contact the Information Access and Privacy Services unit by email at IAPServices@novascotia.ca or phone (902) 424-2985 or 1-844-424-2985.

I acknowledge that I have read and understand the above information regarding the collection, use, and disclosure of my personal information:

Client name [print] _____ Social Insurance Number _____

Client signature _____ Date _____