## **Employee Privacy Policy**

# DISCLAIMER

Doctors of BC is committed to supporting our members by creating tools and resources to help make your practice successful. Tools and resources are prepared for general informational purposes and to assist in discussions with your personal legal counsel.

To ensure the application of these tools and resources fully consider your personal circumstances, you should seek independent legal advice prior to entering into an agreement and/or using these documents. The information provided in this document does not, and is not intended to, constitute legal advice. Members are encouraged to ensure they are current on applicable policies, guidelines, and regulatory and legislative requirements that may be relevant to their obligations.

# OUR COMMITMENT TO PRIVACY

The < > (“Medical Clinic” or “we” or “our”) recognizes the importance of privacy in relation to personal information we receive from our patients, employees, and members of this public. We make every effort to ensure the accuracy, privacy, confidentiality, and security of such information. This policy describes the principles we apply when protecting personal information, and it sets out our expectations of employees in relation to complying with our privacy obligations.

In British Columbia the BC *Personal Information Protection Act* (the “BC PIPA”) regulates the way in which organizations collect, keep, use, secure and disclose personal information. The Medical Clinic is governed by and complies with the BC PIPA.

# OUR ACCOUNTABILITY FOR PERSONAL INFORMATION

“Personal information” refers to any information about an identifiable individual that is collected, used, disclosed, or processed by the Medical Clinic in connection with its services, operations, or administration.

Maintaining the privacy and security of personal information is important to us. We are accountable for the protection of the personal information within our control, and we have a Privacy Officer who is responsible for implementing our privacy management program and ensuring it complies with BC PIPA and other applicable laws.

Employees who have questions about how we use, process, manage and protect personal information may contact our Privacy Officer for more information at <Insert mailing address, email, and phone number>

# THE BASIS ON WHICH WE COLLECT EMPLOYEE PERSONAL INFORMATION

We are permitted to collect, use, and disclose personal information about employees without consent to the extent reasonably required in order to establish, manage, or end the employment relationship and for other purposes that are permitted under BC PIPA and applicable laws.

If we seek to use your information for other purposes, we will ask for your consent before doing unless otherwise permitted under PIPA. Under PIPA consent may be express or implied and can be in written or verbal form.

When you provide consent for the collection, use or disclosure of your employee personal information, your consent can be withdrawn at any time, on reasonable notice. However, withdrawing consent may impact the benefits, programs, or other services that we are able to provide to you. Questions about withdrawing consent should be directed to our Privacy Officer.

# HOW WE USE AND DISCLOSE EMPLOYEE PERSONAL INFORMATION

The Medical Clinic endeavors always to communicate the purposes for which personal information is collected, used, and disclosed at or before the time the information is collected.

When you provide personal information to the Medical Clinic for purposes related to your employment, that information is collected and used for the following purposes:

* recruiting and hiring;
* improving and evaluating our programs and services;
* staffing, scheduling and business and service delivery purposes;
* performance evaluation and monitoring;
* promotion, demotion, and discipline;
* investigating specific incidents involving employees;
* payroll and benefits administration;
* ensuring your safety in the workplace; and
* complying with our legal and regulatory obligations.

We may disclose personal information about employees for these purposes or for other purposes permitted under BC PIPA, such as, where applicable, to our services and benefits providers, legal counsel, insurers, or law enforcement officials. We will seek your consent for other uses of your personal information where required under BC PIPA.

The personal information we may collect for these purposes includes information such as:

* your name, contact information and social insurance number;
* information about your employment history, education, and qualifications;
* financial and banking information needed for payroll and benefits administration;
* information about your workplace performance, conduct and attendance;
* information related to investigations into workplace incidents;
* information needed to respond to complaints or concerns;
* information about your health and medical status if needed to manage and administer your employment or employment related benefits;
* other information that we are required by law to maintain in order to manage our relationship with you or comply with our legal obligations.

# LIMITING COLLECTION, USE, DISCLOSURE & RETENTION

The Medical Clinic endeavors to limit the collection of personal information to what is necessary for the purposes for which it is collected, and we retain personal information for only as long as it is needed for employment, professional, legal, administrative, or operational purposes.

# HOW WE PROTECT YOUR PERSONAL INFORMATION

We protect personal information by ensuring security safeguards appropriate to the sensitivity of the information are in place, including through the use of the following measures:

1. Physical (i.e. locked filing cabinets, restricted access, appropriate security measures when disposing of personal information);
2. Administrative (i.e. security clearances, access only on a “need to know” basis); and,
3. Technological (i.e. passwords, firewalls, data disconnection from the internet, and regular backups) and training of employees.

# THE ACCURACY OF YOUR INFORMATION

We make reasonable efforts to ensure that personal information is as accurate, complete, and current as required for the purposes for which it was collected. In some cases, we rely on our employees to ensure that certain information, such as an individual’s home telephone number, is current, complete, and accurate.

# YOUR RIGHTS

Employees have a right of access to their personal information within the control of the Medical Clinic. We will receive and respond to requests for access to employee records and personal information in accordance with the requirements of BC PIPA and other applicable laws. In some cases, we may refuse access to certain records or information in order to protect other important interests, but we will only do so to the extent this is authorized by BC PIPA.

Employees also have a right under BC PIPA to challenge the accuracy and completeness of their personal information. We receive and respond to all such requests in accordance with the requirements of BC PIPA and other applicable laws.

Employees wishing to make a request for access or correction of their personal information may do so by submitting a written request to the Medical Clinic’s Privacy Officer at the address set out above.

# RESPECTING PRIVACY WHILE AT WORK

The privacy of our patients, colleagues and members of the public is important to us, and we rely on all members of staff (including employees, volunteers, and independent contractors) (“Staff”) to uphold and comply with their obligations under this Policy and BC PIPA. Members of Staff who do not comply with this Privacy Policy may be subject to discipline up to and including dismissal.

Ensuring compliance with this Policy means ensuring that the collection, use and disclosure of personal information about fellow employees and patients while at work complies with the above principles and is respectful of their individual privacy. For example, employees should not post personal information or photographs of their colleagues or patients online or make recordings of individuals in the work place unless they have received express consent from all affected individuals.

# WHO TO CONTACT IF YOU HAVE QUESTIONS, CONCERNS OR COMPLAINTS

Questions, issues of concern or complaints about the processing or protection of your personal information should be directed to the Privacy Officer using the contact information set out above. We will respond to and, where applicable, investigate all complaints or concerns about violations of this Policy or BC PIPA.