

### **Policies:**

Authority to determine its own practice and procedures. That authority is broad enough to permit policies to set reasonable rules for the conduct of representatives and to establish a process to enforce those rules.

### **Code of Conduct**

It is reasonable to expect all participants and representatives to behave in an appropriate manner within the premises of the office. Behaviour which is considered inappropriate includes the following: Making false or misleading statements about the actions of its staff and clients; Speaking, writing or acting towards our staff or clients in an abusive behavior either verbal, or physical, harassing or threatening tone or manner.

### **Protocols for Enforcing Code of Conduct:**

Where staff believe that a representative has violated the Code of Conduct by acting in an inappropriate manner, particulars of that behaviour will be presented to their manager. Where the manager is satisfied that the Code of Conduct has been violated, they will write to the representative advising of the Code of Conduct and the inappropriateness of the behaviour.

Additionally, if a further incident of inappropriate behaviour occurs or reported after the representative, employee or client has been presented with a notice, the manager will bring the particulars to the attention of their business unit's Director. The Director, along with 2 other Directors chosen by the business unit Director, will form a Panel to review the behaviour. Where the Panel agrees that the behaviour violates the Code of Conduct, the business unit Director will issue notice to the individual that their status as a representative or client will no longer be recognized by WE CAN WIN. In other words, violation in any form by either client, representatives, employees or volunteers will lead to termination of employment or the privilege of the program. Please note other sorts of violations may lead to prosecution and lawsuit under the safety policies act'.

### **First Aid Requirements:**

Every employer employing not more than five workers in any one shift at a place of employment shall provide and maintain at the place of employment a first aid station with a first aid box

## **PROTECTION OF INDIVIDUAL PRIVACY**

### **Collection and Retention of Personal Information**

This Part does not apply to personal information that is maintained for the purpose of creating a record that is available to the general public.

38. (1) In this section and in section 39,

“Personal information” includes information that is not recorded and that is otherwise defined as “personal information” under this Act. R.S.O. 1990, c. F.31, s. 38 (1).

#### Collection of personal information

(2) No person shall collect personal information on behalf of an We Can Win unless the collection is expressly authorized by statute, used for the purposes of law enforcement or necessary to the proper administration of a lawfully authorized activity. R.S.O. 1990, c. F.31, s. 38 (2).

#### Manner of collection

39(1) Personal information shall only be collected by an We Can Win directly from the individual to whom the information relates unless,

(a) the individual authorizes another manner of collection;

(b) the personal information may be disclosed to the We Can Win concerned under section 42 or under section 32 of the Municipal Freedom of Information and Protection of Privacy Act;

(c) the Commissioner has authorized the manner of collection under clause 59 (c);

(d) the information is in a report from a reporting agency in accordance with the Consumer Reporting Act;

(e) the information is collected for the purpose of determining suitability for an honour or award to recognize outstanding achievement or distinguished service;

(f) the information is collected for the purpose of the conduct of a proceeding or a possible proceeding before a court or tribunal;

(g) the information is collected for the purpose of law enforcement; or

(h) another manner of collection is authorized by or under a statute. R.S.O. 1990, c. F.31, s. 39 (1).

#### Notice to individual

(2) Where personal information is collected on behalf of an institution, the head shall, unless notice is waived by the responsible minister, inform the individual to whom the information relates of,

(a) the legal authority for the collection;

(b) the principal purpose or purposes for which the personal information is intended to be used; and



(c)the title, business address and business telephone number of a public official who can answer the individual's questions about the collection. R.S.O. 1990, c. F.31, s. 39 (2).

#### Retention of personal information

40. (1) Personal information that has been used by We Can Win shall be retained after use by the We Can Win for the period prescribed by regulation in order to ensure that the individual to whom it relates has a reasonable opportunity to obtain access to the personal information.

#### Standard of accuracy

(2) The head of We Can Win shall take reasonable steps to ensure that personal information on the records of the We Can Win is not used unless it is accurate and up to date. R.S.O. 1990, c. F.31, s. 40 (2).

#### Exception

(3) Subsection (2) does not apply to personal information collected for law enforcement purposes. R.S.O. 1990, c. F.31, s. 40 (3).

#### Disposal of personal information

(4) A head shall dispose of personal information under the control of the We Can Win in accordance with the regulations. R.S.O. 1990, c. F.31, s. 40 (4).

#### Use and Disclosure of Personal Information

##### Use of personal information

41. (1) We Can Win shall not use personal information in its custody or under its control except,

(a)where the person to whom the information relates has identified that information in particular and consented to its use;

(b)for the purpose for which it was obtained or compiled or for a consistent purpose;

(c)for a purpose for which the information may be disclosed to the We Can Win under section 42 or under section 32 of the Municipal Freedom of Information and Protection of Privacy Act; or

(d)subject to subsection (2), Organization We Can Win may use personal information in its alumni records and a hospital may use personal information in its records for the purpose of its own fundraising activities, if the personal information is reasonably necessary for the fundraising activities

## Our commitment

We want to achieve a balance between actions which promote cooperation and compliance, and actions necessary to address non-compliance and fraud.

### *We commit to:*

- **focusing on activities that emphasize education and cooperation**
  - providing help for those who want it through **outreach** and excellent customer service
  - taking **action** to bring you into compliance and keep you there
  - using **enforcement** as a last resort, in a fair and consistent manner
  - Our approach
  - Compliance is a mutual obligation based on 3 simple principles: you must **know** and **understand** your obligations, you must be **able** to comply, you must be willing to comply.
  
- **We will**
  - provide our clients with the information need to fulfill obligations
  - make it easier to work with us through improved services
  - focus on finding compliance gaps and problems, and then developing the right interventions to fix them
  
- **OBJECTIVE**
  - To further the Board's commitment to engaging /Clients/Representatives and to establish the framework for an equitable, effective, and efficient representation and leadership across the system
  
- **EMPLOYMENT EQUITY**
  - To establish the Board's commitment to the development, implementation and maintenance of employment and promotion policies, practices and procedures that result in and sustain a workforce that, at all levels, reflects, understands and responds to a diverse population