

# **Judo Ontario Privacy Policy**

Approval Authority	Board of Directors	March 19 <sup>th</sup> , 2017
		Date



#### **Policy Statement**

Judo Ontario is committed to promoting an association based on the values of respect and solidarity. In order to build a culture of respect and dignity, your association has adopted a policy to protect its members', employees', volunteers' and representatives' right to privacy.

## **About the Policy**

This policy clearly outlines your rights and expectations concerning the management of personal information by Judo Ontario and its authorized agents. Its effective implementation hinges on your cooperation as representatives (zones, clubs and volunteers), since the collection and use of this information is largely done by you.

# Why a policy? - As of January 01, 2004 required by the Government of Canada.

Respect within our association begins with respect for each individual member and for his or her right to privacy. We require information in order to achieve our mission and develop activities, but we must ensure that we collect only those details necessary, and that we protect the confidential nature of more delicate information such as that pertaining to the physical and medical condition of our participants and athletes. Our behaviour must earn the trust of our members; respect for their rights demands it, our commitment to mutual benefit requires it.

Secondly, each Provincial jurisdiction is ruled by codes or acts that regulate management of personal information in the private and public sectors and the federal Personal Information Protection and Electronic Documents Act articulate the principle of respect for individual privacy and the measures that now regulate the collection and use of personal information.

This policy is primarily based on the principles of Canadian standard CAN/CSA 830-96 entitled Model Code for the Protection of Personal Information. Given the need to distribute certain information across Canada, Judo Ontario is attempting with this policy to surpass federal and legislative (in certain regards) standards without declaring itself a "business" in the sense expressed by these acts.

# **Policy Overview**

This policy outlines our main procedures and articulates your rights and expectations. (CSA 4.8.2) The parenthetical reference at the end of certain paragraphs refers to the article of the Canadian standard.



This standard contains 10 principles:

- 1. Accountability
- 2. Identifying purposes
- 3. Consent
- 4. Limiting collection
- 5. Limiting use, disclosure and retention
- 6. Accuracy
- 7. Safeguards
- 8. Openness
- 9. Individual access
- 10. Challenging compliance

In particular, the present policy duly explains:

- the individual officially responsible for administration of the policy
- how individuals can gain access to information
- description of the types of personal information collected and retained
- how collection, use, and retention measures are publicized
- which organizations will have access to certain personal details and under what conditions
- annotation and correction of personal files

## Who is subject to the policy?

All employees, contractual workers, administrators, volunteers, delegation heads, coaches and those who accompany national delegations, as well as all representatives and authorized agents administering a program or activity organized or sanctioned by Judo Ontario. Judo Ontario Member Clubs that collect information on behalf of Judo Ontario must also adhere to this policy.

Respect for the confidentiality of personal information is a condition of nomination, employment and continuing hire of employees, contractual workers, delegation heads, coaches and those who accompany national delegations, as well as all representatives and authorized agents of Judo Ontario. (CSA 4.7.3 to .5) In the case of volunteer administrators, failure to adhere to this policy is considered a breach of the Administrator's Code of Ethics.

#### Who is responsible for this policy?

The Board of Directors will annually assign a designate who is responsible for the implementation of this policy. S/He reports to the Board of Directors on the association's adherence to the policy. (CSA 4.1)

- S/He, in cooperation with the Board of Directors, develops internal directives for the implementation of the policy among office staff. (CSA 4.1.4(a))
- S/He is responsible for training and communicating to employees, contractual staff, volunteer administrators, heads of delegations, coaches and those who accompany national delegations,



as well as all representatives and authorized agents administering a program or activity organized or sanctioned by Judo Ontario, (in) all policies and procedures. (CSA 4.1.4(c,d))

• S/He administers complaint and disciplinary mechanisms. (CSA 4.1.4(b))

#### Does Judo Ontario retain information about me?

In the appendix to the present document, you will find a description of the main collections of information held by Judo Ontario (CSA 4.2). In essence, these are comprised of personal details provided by you at the time of annual registration, as well as your results and participation in sanctioned activities (i.e.: points accumulated toward ranking, grading). If you are a member of a national or development team, your file may also contain medical information that you provided to the national or project coach or head of delegation, as well as your competition results. If you are/were a recipient of the Athletes Assistance Program, Judo Ontario retains information on your doping control file, data pertaining to the WADA whereabouts program, your personal correspondence pertaining to application for various scholarships, etc. Judo Ontario also retains information on refereeing levels, as well as copies of grading and other related forms; we also maintain files for those under consideration for special recognition (i.e.: Hall of Fame, x years as a provincial volunteer, etc.). As an employer, we also maintain information on our employees and contractual workers (i.e.: salary and social benefits, etc.). (CSA 4.2)

#### What do you do with this information about me?

In the appendix to the present document, you will find a description of the main collections of information held by Judo Ontario. Information collected is used in the administration of the association's programs and activities. Judo Ontario formally pledges not to sell or share its membership list with anyone, unless required to by law. However, Judo Ontario Member Clubs, technical directors of judo clubs may receive information about judo-related products and services via regular mail; these mailings are controlled by the association. (CSA 4.3.3)

When you register for an activity, officials (the organizers, referees, permanent office staff) generally have access to your personal information. You cannot expect complete privacy in matters concerning personal information necessary to the organization of a tournament. Your name, age category, weight category, grade, gender, the identity of your competitors, and your results will be made public at the competition site and in the official results posted by Judo Ontario. The latter may be shared with the media and be posted to the association Web site.

#### How does Judo Ontario gain my consent?

By providing your personal information at the time of annual registration or by registering for activities, you are authorizing the association and its representatives to use your information in order to offer you products and services. (CSA 4.2) During the next few years, we will be revising various association forms in order to keep you better informed. Judo Ontario does not record your telephone communications with office staff or monitor your visits to our Web site. When you wish to obtain a product or service,



Judo Ontario may use information you provide to complete your request; this includes use of letters, faxes or e-mails. How does Judo Ontario manage this information? All personal information is centralized at the office of Judo Ontario. Files and computers are locked each evening and are under the constant supervision of the permanent office staff during the day. All files related to an individual's application for employment or to complaints are under the control of the Chair of the relevant committee. (CSA 4.3.4) Only the individuals identified in this policy, with a legitimate need to retrieve information, are permitted to consult files containing personal information. (CSA 4.3.5) Judo Ontario Member Clubs that retain a copy of the annual registration list are reminded that information therein may be used only to aid in the administration of activities sanctioned by the zone and by Judo Ontario. (CSA 4.3.6) 6 The attached descriptions of the main collections of information held by Judo Ontario also explain the security, storage and destruction procedures for each type of information. (CSA 4.5; 4.5.1; 4.5.3) Transitory documents not retained (copies, printouts from a database, original copies of registration forms) may be destroyed by the individual responsible for collecting the document.

#### Right to access and correct personal information

You have the right to consult the information holdings to examine information about you, within the limits imposed by law. If the relevant information concerns a minor, the request must be made by that individual as well as a representative of parental authority (parent or guardian).

The request is made by way of a letter addressed to the office of the association. (CSA 4.9.5, 4.6) There is no fee for this service. Judo Ontario reserves the right to question apparently frivolous or harassing demands that would paralyze association operations. (CSA 4.9.4)

Requests to correct personal information should be made in the same way. Judo Ontario will verify the request and make the correction if the relevant files are inaccurate. Any request for correction will be noted in an individual's file, whether or not the correction is ultimately made. (CSA 4.9.5, 4.6)

An annotation will also be made in a file if a request for access is made by an individual other than the concerned party. For example, if a legitimate organization seeks to learn whether an individual is a member in good standing of the association.

#### Right to challenge compliance

Any complaint regarding failure to comply with this policy must be addressed in writing to the Designate. (CSA 4.10.1 and .2)

The Designate will undertake an investigation of all challenges and take corrective action. (CSA 4.10.3 and .4)



If this action requires making modifications to policies or practices, the Designate will submit a report to the Board of Directors, which will consider and approve such modifications if the original complaint is determined to be well founded.

If any member finds that a complaint is not dealt with to his or her satisfaction, he or she may appeal the decision to the Board of Directors. The Board of Directors will examine the appeal, as well as the Designate's report. The Committee will then choose to support or challenge the decision or actions of the Designate. The decision of the Board of Directors is final, and may not be appealed.

If a governmental authority believes that it has jurisdiction over a situation or complaint by virtue of an applicable federal or provincial law, Judo Ontario will cooperate fully with the agency in question.