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**PSAC PRIVACY AND  
CONFIDENTIALITY  
POLICIES**

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### Preamble

This policy guides PSAC's practices concerning the collection, use, disclosure, and protection of personal information.

PSAC is committed to protecting the privacy, confidentiality, accuracy, and security of members' personal information it collects, uses, and retains in the course of fulfilling its legitimate purposes as a certified bargaining agent.

For purposes of this Privacy Policy, "PSAC" refers and applies to the Public Service Alliance of Canada (including its regional offices) and its components, locals, directly chartered locals, and other related or affiliated organizations.

### What is Personal Information?

"Personal Information" is defined as information concerning an identifiable individual, such as their home address, home email address, home telephone number, social insurance number, family status, national or ethnic origin, membership in an equity group, or record of union interests and involvement.

Personal information does not include aggregate information which cannot be associated with a specific individual, and it does not include the name, title, business address, business email address, or business telephone number of an individual.

### Why does PSAC Need Personal Information?

PSAC collects personal information of employees working in bargaining units it represents in order to fulfill its legitimate purposes. PSAC needs personal information to carry out its representational obligations and provide a variety of member services, and to communicate and engage members in union business.

For example, PSAC may need to communicate with you outside the workplace for a final offer or strike vote or to comply with other statutory obligations; to provide services related to grievances, legal services, and other advocacy and assistance; or to conduct research.

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Accordingly, PSAC collects personal information in order to:

- Assist the union in representing its members with respect to employment under collective agreements and applicable legislation;
- Investigate and resolve grievances, appeals, and claims;
- Maintain a complete record of membership in the union;
- Communicate and engage with members in union business and respond to their enquiries;
- Provide information about union membership programs and benefits;
- Provide print and online information services;
- Administer the business of the union, including component/local business, correspondence, and research (i.e., member surveys);
- Consult with members with respect to union programs, priorities, and activities;
- Facilitate participation in union events;
- Collect and manage dues and assessments;
- Collect members' demographic information (e.g., language preference, years of membership);
- Verify eligibility for and administer strike pay and benefits;
- Process members' expense claims for participation in union events or activities;
- For social and political advocacy in accordance with the mandate set out in the PSAC constitution; and
- Comply with other statutory or regulatory requirements.

### **What Personal Information does PSAC Collect?**

In order to fulfill its legitimate purposes, PSAC may collect personal information including your name, home mailing address, email address, telephone number, social insurance number, and demographic information such as your birth date, gender, and language preference. PSAC may also collect employment-related information including your work history, job classification, duties, rates of pay, and dues records.

Additional information may also be collected to fulfill other representational obligations or to provide specific services to you. For example, PSAC officers may collect or use additional personal information in the course of providing representation in respect of grievances or other matters arising under a collective agreement or otherwise related to your employment, or it may collect self-identification information regarding membership in an equity group in relation to the provision of specific programs or services.

PSAC is committed to ensuring that any personal information it collects, uses, discloses or retains is as accurate, current, and complete as necessary for the purposes for which it uses the data.

### **How does PSAC Collect Personal Information?**

As a general rule, PSAC will not collect, use, or disclose personal information without consent. However, there are some circumstances in which consent is not required or cannot be obtained. For example, PSAC may collect and use personal information provided by employers in accordance with collective agreements or by order of a court or administrative tribunal.

PSAC may collect and retain personal information from the following sources:

- Dues and membership forms;
- Grievance, appeal, or claim forms;
- Information provided by employers in accordance with collective agreements or by order of a court or administrative tribunal;
- Information provided pursuant to statutory or regulatory requirements;

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- Other information provided by members through surveys, registration forms, etc.; and
- Through members' interactions with union officers and staff, including email and other correspondence.

### **How does PSAC Protect Personal Information?**

PSAC is committed to protecting your personal information from unauthorized use and disclosure. Our commitment means that:

- All personal information collected by PSAC is held in strict confidence;
- We will employ appropriate safeguards and security standards to protect and maintain the confidentiality of your personal information and to ensure only authorized individuals have access to your personal information;
- We will ensure that access to personal information is limited to authorized PSAC employees, officers, and representatives in the performance of their job function and/or for fulfilment of PSAC's legitimate purposes. In some circumstances, PSAC may also share personal information with external legal or financial advisors, consultants, contractors, or regulators who require access to this information in fulfillment of PSAC's legitimate purposes;
- We will use your personal information only for the purposes we have identified;
- We will not disclose your personal information without your permission unless we are required or authorized by law to do so; and
- We will retain personal information only as long as required to fulfil the purpose for which it was collected. When your personal information is no longer required we will destroy it in a confidential, secure method.

PSAC will not distribute personal information to a third party without your consent unless required to do so by law, in which case the information released will be limited to what is legally required. In some circumstances, PSAC may share members' personal information with legal or financial advisors, consultants, benefit and pension plan administrators, insurers, or contractors retained by PSAC to fulfill its legitimate purposes. Membership lists and personal information about members will never be sold or used for any commercial purposes.

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Although PSAC does not take responsibility for any theft, misuse, unauthorized disclosure, loss, alteration or destruction of data by other parties, PSAC takes reasonable precautions to prevent such an event. PSAC staff or elected officers found to be abusing membership information can be subject to disciplinary action in accordance with the applicable staff collective agreement or the PSAC Constitution.

### **Personal Information Inquiries**

Individuals have the right to request access to their personal information under the control of PSAC, and may request corrections to personal information so that it is complete, accurate, and up to date.

In certain situations, we may not be able to provide access to certain personal information that we hold about an individual. Such instances may include, but are not limited to:

- Where provision may reveal personal information about another individual.
- Where the information is subject to solicitor-client privilege.
- Where the information was collected in relation to an investigation or a contravention of federal or provincial law.
- Where provision could reasonably be expected to threaten the health or safety of an individual.

If access cannot be provided, PSAC will notify the individual making the request, in writing, of the reasons for the refusal. Where access has been provided and where the information is demonstrated to be inaccurate or incomplete, PSAC will amend the information as required.

PSAC has a designated Privacy Officer who is responsible for ensuring compliance with this policy and assisting members with their inquiries. The Privacy Officer also has delegated authority to issue directives or decisions regarding the interpretation and application of this Policy.

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**All questions, concerns, or complaints regarding privacy matters may be directed to the PSAC Privacy Officer: [Privacy-Confidentialite@psac-afpc.com](mailto:Privacy-Confidentialite@psac-afpc.com)**

Within fifteen (15) days of receiving a complaint, the Privacy Officer will contact you to acknowledge the complaint has been received and to establish a timeframe for its resolution. If you are not satisfied with the resolution of your complaint, or if your complaint is about the Privacy Officer, the matter may then be referred to the Office of the National President.



### APPENDIX A: PSAC CONFIDENTIALITY POLICY

In addition to the above privacy policy, which is primarily for the information of the membership, PSAC has established a confidentiality policy, with the aim of communicating the privacy and confidentiality obligations of the union to its elected officers and staff.

The Confidentiality Policy includes the following items: <sup>1</sup>

1. PSAC is committed to protecting the privacy, confidentiality, accuracy, and security of personal information it collects, uses, and retains in the course of fulfilling its legitimate purposes as a certified bargaining agent.
2. The collection, use, disclosure, and retention of personal information by PSAC is governed by the PSAC Privacy Policy and by this Confidentiality Policy.
3. All employee and member information held by PSAC is confidential and is not to be communicated to anyone in any manner, except in accordance with PSAC policies or as required by law.
4. All elected officers and staff of PSAC are required to sign the Confidentiality Agreement (see Appendix B).
5. Information may be shared internally within PSAC for the purposes of carrying out PSAC's legitimate purposes, providing representation to members in grievances or other matters, and in performing human resources functions.
6. Consent must be obtained before disclosing a member's personal information to any external organization, except as may be outlined in the Privacy Policy or required by law.
7. The confidentiality obligations regarding employee and member information remain in effect after termination of the employment relationship and/or executive appointment.

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<sup>1</sup> modeled after the National Component's Confidentiality Policy

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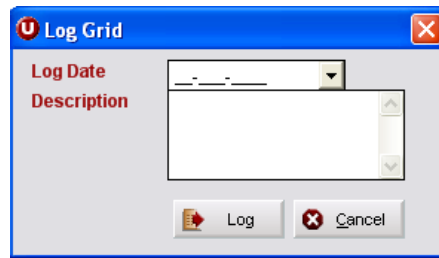
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8. PSAC will limit access to UnionWare electronic exports or printouts of membership data, to a specific number of users throughout the organization (see Appendix D).
9. A breach of confidentiality is considered a serious matter and may be determined just cause for discipline.

**APPENDIX B: PSAC CONFIDENTIALITY AGREEMENT**

All PSAC staff members and elected officers who will have access to member information through UnionWare or other sources are required to sign a statement of confidentiality, to be kept on file by PSAC.

Furthermore, when a request for export/print of a members list is made via UnionWare, the user will have to log the date of the request and the description/reason of the request. The UnionWare Administrator has access to query the reports log.



Statement of Confidentiality

I have read and reviewed the policies on privacy and confidentiality of employee and member files of PSAC, including information in the UnionWare system.

I understand that all employee and member information to which I have access is confidential and is not to be communicated or disclosed to anyone in any manner, except in accordance with PSAC policies or as required by law.

**Name:** \_\_\_\_\_

**Component:** \_\_\_\_\_

**Branch/Section or RO:** \_\_\_\_\_

**Job title:** \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Witness: \_\_\_\_\_

Date: \_\_\_\_\_

## **APPENDIX C: PSAC CONFIDENTIALITY NOTICE**

In addition, PSAC will ensure that any personal information provided to regional offices, components, or locals (e.g., member lists) is accompanied by a confidentiality notice reminding recipients of the sensitivity of the information and referring them to the Privacy Policy.

### Notice: Confidentiality of Enclosed Information

The enclosed records include personal information which is sensitive and confidential.

PSAC is committed to protecting the privacy, confidentiality, accuracy, and security of the personal information it collects, retains, and discloses to regional offices, components, or locals.

The enclosed information is being provided solely for the specific and exclusive purpose of :

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All employee and member information which you are hereby provided is confidential and must not be communicated or disclosed to anyone in any manner, except in accordance with PSAC's Privacy and Confidentiality policies, or as required by law.

If you have any questions or concerns regarding your rights and obligations with respect to the enclosed information, please contact [Privacy-Confidentialite@psac-afpc.com](mailto:Privacy-Confidentialite@psac-afpc.com) and your message will be forwarded to the PSAC Privacy Officer.

## **APPENDIX D: List of staff and elected officer positions authorized to export/print membership data from UnionWare**

The following will have access to export/print membership lists from UnionWare: listings by Local, by Regional Office, by Bargaining Unit, etc., based on their specific user access rights:

- Components Membership/Check-off Clerks
- Regional Offices Administrative Assistants and Secretaries
- PSAC @ 233 Gilmour:
  - UW Project Officer or Advisors
  - Mail Distribution Centre Supervisor
  - Membership Administration Supervisor
  - Membership Administration Officer
  - Membership Administration Dues Account Officer
- Others (this list could expand with time, and will be kept up-to-date)

Any membership list or report with an official status will be generated by the Mail Distribution Centre Supervisor, the Membership Administration Supervisor or the UnionWare Project Officer. These would include, and are not limited to, reports required in light of the Constitution or Regulations, such as the following:

Ratification Voting Lists;  
Convention Delegate Entitlements;  
National Board of Directors block vote entitlements;  
Any report in light of Regulations 15A, B or C