

Ministry of Training,  
Colleges and Universities  
Employment and Training Division  
3<sup>rd</sup> Floor, Mowat Block  
900 Bay Street, Queen's Park  
Toronto ON M7A 1L2

Ministère de la Formation  
et des Collèges et Universités  
Division de l'emploi et de la formation  
3<sup>e</sup> étage, édifice Mowat  
900, rue Bay, Queen's Park  
Toronto (ON) M7A 1L2



**MEMORANDUM TO:** Employment Ontario Service Providers

**FROM:** Jennifer Barton,  
Regional Director, Eastern Region  
Heather Cross, (A)  
Regional Director, Western Region  
Andrew Irvine,  
Regional Director, Northern Region  
Shelley Unterlander,  
Regional Director, Central Region

**DATE:** April 4, 2016

**SUBJECT:** **Reminder of Employment Ontario (EO) Service Provider  
Privacy Obligations**

---

**OBJECTIVE:**

The ministry would like to remind your organization of the importance of privacy in the access and use of client information. This is in keeping with the privacy obligations outlined in your agreement. A [Privacy Tip Sheet](#) for EO service providers is now available on the Employment Ontario Partners Gateway (EOPG). It will provide you with tips to safeguard clients' personal information and for reviewing the notice of collection with clients. It includes a list of additional privacy resources.

**BACKGROUND:**

In light of a recent privacy breach, the ministry would like to remind all service providers of the importance of protecting personal client information.

The ministry is committed to protecting the personal information of our clients with support from the service provider network. As identified below, these obligations are outlined in the program guidelines, transfer payment agreements and the EOIS-CaMS staff registration form. Service providers are responsible for understanding their legally binding privacy obligations in the access and use of client information in the delivery of EO programs.

**PRIVACY OBLIGATIONS:**

## EO Program Guidelines

All EO Program Guidelines requiring third-party delivery state that service providers must keep personal information secure at all times. Service providers are also expected to establish standard security measures that will help them meet their responsibilities under their agreement.

### Agreement

The transfer payment agreement between the ministry and service provider clearly states service provider responsibilities and obligations regarding client information and privacy. Upon signing the agreement, the service provider agrees to:

- **Article 2.3, Governance**, requires a publicly available, written code of conduct and ethical responsibilities. This includes a policy on protection of privacy in accordance with applicable law or that is consistent with the Canadian Standards Association Code for the Protection of Personal Information.
- **Article 7.2, Record Maintenance**, requires the maintenance of records and documents containing personal information for a period of seven years.
- **Article 9, Access to Information and Protection of Privacy**, contains an acknowledgement of the ministry's obligations under FIPPA and is tailored to specific programs.
- **Schedule D, Reports**, may contain language that requires the service provider to courier or personally deliver client information to the ministry on a **strong** password protected USB flash drive, where applicable.

### Employment Ontario Service Provider Staff EOIS-CaMS Registration Form

The EO Service Provider Staff EOIS-CaMS Registration Form requires service provider staff to agree to protect clients' personal information and only access and use clients' information to administer the program. The ministry may revoke access if a breach of the system is suspected. User activity can be audited.

Service providers are expected to manage EOIS-CaMS accounts in a responsible manner. This includes the timely deactivation of individuals who leave the organization.

### RESOURCES AVAILABLE:

Please take some time to review the [Employment Ontario Privacy Tip Sheet](#) posted on the EOPG web site. The tip sheet provides an overview of your organization's privacy obligations. It also outlines the information that should be provided when reviewing and

explaining the ministry's notice of consent, collection, use and disclosure of clients' personal information.

For information about managing user accounts in CaMS, service providers may familiarize themselves with the [Employment Ontario Information System \(EOIS\) Case Management System Service Provider User Guide, Chapter 4: Service Provider Information and User Management](#).

Additional Resources are available through the [Office of the Information and Privacy Commissioner of Ontario](#).

Safeguarding clients' personal information is a serious matter. Please familiarize yourself with the tools and resources outlined in this memorandum. Should you have any questions, please contact your respective Employment and Training Consultant.

Thank you,



Shelley Unterlander, Regional Director  
Central Region



Andrew Irvine, Regional Director  
Northern Region



Heather Cross, (A) Regional Director  
Western Region



Jennifer Barton, Regional Director  
Eastern Region