

PRIVACY AND PERSONAL INFORMATION Policy and Procedures

| | | | |
|-----------------------|--------------------|-------------------|----------|
| Approved By: | Executive Director | Policy No: | PPI 1-50 |
| Approved Date: | September 22, 2025 | Page: | 1 of 3 |
| Supersedes: | | | |
| References: | | | |

IDENTITY VERIFICATION PROCESS FOR INDIVIDUALS REQUESTING ACCESS TO RECORDS OF PERSONAL INFORMATION

1.0 PURPOSE

The purpose of this policy is to establish procedures for verifying the identity of individuals requesting access to records of personal information, as authorized under Section 312 of the *Child, Youth and Family Services Act* (CYFSA).

2.0 SCOPE

This policy applies to all staff members responsible for supporting and processing Access to Records of Personal Information requests.

3.0 DEFINITIONS

None

4.0 POLICY STATEMENT

- 4.1 The Children's Aid Society of Oxford County (the "Society") holds highly sensitive personal information about children and youth, their families, and other individuals. In accordance with the CYFSA, the Society is committed to upholding the highest standards of privacy, transparency, and accountability in the management of personal information. The Society also recognizes the right of individuals to access their records of personal information pursuant to Part X of the CYFSA, subject to limited exceptions.
- 4.2 To safeguard against unauthorized disclosure, the Society requires identity verification for all individuals requesting access to their records of personal information. This process ensures that records are released only to the correct and authorized recipient, in alignment with privacy obligations under applicable legislation.

5.0 PROCEDURES

5.1 General Procedures:

- 5.1.1 The Society requires that all requesters provide valid government-issued photo documentation at the time of their submission for access to records of personal information.
- 5.1.2 Prior to releasing records of personal information, the Society will verify the valid government-issued photo documentation. The Society offers three approved identification verification options:
 - a. **Virtual meeting:** A staff member conducts a live video meeting with the requester and compares their image to the name and photograph on a valid government-issued photo identification document.
 - b. **Photographic submission:** The requester submits a photo of themselves holding their government-issued photo identification document, allowing staff to visually confirm identity through comparison.
 - c. **In-person meeting:** An appointment is scheduled for the requester to present their government-issued photo identification document in person to a designated staff member for verification.
- 5.1.3 In exceptional circumstances, the Society may verify identity by other means in consultation with the Society's Privacy Designate.
- 5.1.4 The Society does not record or retain any images, video, or copies of identification used during the verification process. Instead, a contact log entry is documented in the individual's file to confirm that identity verification was completed using one of the approved methods.
- 5.1.5 Identity verification must be successfully completed before any records of personal information are released to the requester.
- 5.1.6 If identity cannot be verified, the Society may be unable to proceed with the request until verification is completed.

5.2 Training:

5.2.1 All staff members responsible for supporting and processing Access to Records of Personal Information requests must be familiar with this policy and are expected to adhere to its procedures and requirements as part of their role-specific responsibilities.

6.0 RELATED DOCUMENTS

None

7.0 APPENDICES

None