



**FIELD HOCKEY ONTARIO**  
Box# 80030  
Appleby Line, Burlington, ON  
L7L 6B1  
**tel:** 1 (877) 605-0855  
info@fieldhockeyontario.com

## PRIVACY POLICY

### Purpose

1. Privacy of personal information is governed in Ontario by the Personal Information Protections and Electronic Documents Act (PIPEDA). This policy describes the way that Field Hockey Ontario (FHO) collects, uses, safeguards, discloses and disposes of personal information, and states FHO's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA and FHO's interpretation of these responsibilities.

### Background

2. FHO promotes the playing and advancement of Field Hockey, both outdoor and indoor in the Province of Ontario. As the governing body of the sport we strive to provide players, coaches, officials, club administrators, parents and every other field hockey stakeholder the opportunities and tools to achieve their goals within this sport. Junior or Senior, recreational, competitive or elite, FHO is committed to providing a sport environment which is consistent with our core values; integrity, excellence, respectful engagement and community spirit.

### Personal Information

3. Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g. health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information, however, does not include business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

### Accountability

4. Director responsible for Membership Services is the Privacy Officer and is responsible for monitoring information collection and data security, and ensuring that all staff/volunteers receives appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles personal information access requests and complaints. The Privacy Officer may be contacted at the following email address: events@fieldhockeyontario.com.

### Reasons for Collection

5. Personal information will only be collected by FHO to meet and maintain the highest standard of organizing and programming the sport of field hockey. FHO collects personal information from prospective members, members, coaches, umpires, participants, managers and volunteers for purposes that include, but are not limited to the following:





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- a. Communications
  - i. Receiving communications from FHO, in regards to E-news, newsletters, programs, competitions, training, discipline, appeals, events, activities and other pertinent information.
  - ii. Published articles, media relations and posting on the FHO website, displays or posters.
  - iii. Award nominations, biographies, published articles and media relations.
  - iv. Communication within and between committees, volunteers and Board members.
  - v. Discipline results and long-term suspension list to notify Field Hockey Canada and FHO Clubs of suspended members.
  - vi. Communications with applicable municipalities who wish to check residency status of individuals.
- b. Registration, Database Entry and Monitoring
  - i. Disclosure to FHO Provincial team staff, FHO Clubs, who will use such information for registration and communication of programs, events and activities.
  - ii. Disclosure to FHO Clubs, MTCS for the purpose of relaying and collecting information which is used to direct the public to such Club, National or Provincial Association and to provide easy access for club-to-club communication.
  - iii. Database entry at the Coaching Association of Canada and to determine level of coaching certification, coaching qualifications and coach selection.
  - iv. Database entry to determine level of officiating certification and qualifications.
  - v. Registration for programs, events and activities.
  - vi. Determination of member club, eligibility, age group and appropriate level of play/competition.
  - vii. Player Registration, outfitting uniforms, and various components of athlete and team selection.
  - viii. Technical monitoring, Coach/Club review, officials training, educational purposes, sport promotion, media publications.
- c. Sales, Promotions and Merchandising
  - i. Purchasing equipment, coaching manuals, resources and other products.
  - ii. Promotion and sale of merchandise.
- d. General
  - i. Travel arrangement and administration.
  - ii. Implementation of the FHO screening program.
  - iii. Medical emergency, emergency contacts or reports relating to medical or emergency issues.
  - iv. Determination of membership demographics and program wants and needs.
  - v. Managing insurance claims and insurance investigations.





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- vi. Video recording and photography for personal use, and not commercial gain, by spectators, parents and friends.
- vii. Video recording and photography for promotional use, TV, webcast or print media, marketing and advertising by FHO, Clubs and Leagues.
- viii. Payroll, honorariums
- e. Other - Personal information beyond name, address, phone number, cell phone number, and email address maybe collected for the purposes below:
  - i. NCCP number, education, resumes and experience for database entry at the Coaching Association of Canada to determine the level of certification and coaching qualifications, for making coaching assignments.
  - ii. Credit card information (on secure website) for registration, travel administration and other products and resources.
  - iii. Date of birth, athlete biography, member club to determine eligibility, age group and appropriate level of play.
  - iv. Criminal records check and related personal reference information for the purpose of implementing the FHO's volunteer screening program.
  - v. Personal health information including provincial health card numbers, allergies, emergency contact, and past medical history for use in the case of medical emergency.
  - vi. Athlete information including height, weight, uniform size, shoe size, feedback from coaches, trainers, performance results from athlete registration forms, outfitting uniforms, media relations, and various components of athlete and team selection.
  - vii. Athlete whereabouts information including sport/discipline, training times and venues, training camp dates and locations, travel plans, competition schedule, disability if applicable for the Canadian Centre for Ethics in Sport inquiries for the purposes of out-of-competition drug testing.
  - viii. Body weight, mass, body and fat index to monitor physical response to training.
  - ix. Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure and program wants and needs.
  - x. Passport numbers and/or copies of passports for the purposes of arranging travel.
  - xi. Name, address, phone number, cell phone number, fax number, e-mail address for the purpose of providing insurance coverage, managing insurance claims and conducting insurance investigations.
  - xii. Players lists and contact information within the FHO Clubs/or teams for the purpose of notification of try-outs for other levels of field hockey in Ontario
  - xiii. If a purpose has not been identified herein, FHO will seek consent from individuals when personal information is used for a purpose not already consented to. This consent will be documented as to when and how it was received.





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### **Consent**

6. Consent is required to be obtained by lawful means from individuals at the time of collection, prior to the use or disclosure of the personal information. If the consent to the collection, use or disclosure was not obtained upon receipt of the information, consent will be obtained prior to the use or disclosure of that information. FHO may collect personal information without consent where reasonable to do so and where permitted by law.
7. By providing personal information to FHO, individuals are consenting to the use of the information for the purposes identified in this policy.
8. FHO will not, as a condition of product or service, require an individual to consent to the collection, use or disclosure of information beyond that required to fulfill the specified purpose.
9. An individual may withdraw consent; use or disclosure of personal information at any time, subject to legal or contractual restrictions, provided the individual gives one week's notice of such withdrawal to FHO. The Privacy Officer will advise the individual of the implications of such withdrawal.

### **Limiting Collection**

10. All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy. FHO will not use any form of deception to obtain personal information.

### **Limiting Use, Disclosure and Retention**

11. Personal information will not be used or disclosed by FHO for purposes other than those for which it was collected as described herein, except with the consent of the individual or as required by law.
12. Personal information will be retained for certain periods of time in accordance with the following:
  - a. Registration data and athlete information will be retained after an individual has left a program of FHO, in the event that the individual chooses to return to the program.
  - b. Parental/family information will be retained after an individual has left a program of FHO, in the event that the individual chooses to return to the program.
  - c. Information collected by coaches will be retained after an individual has left a program of FHO, in the event the individual chooses to return to the program.
  - d. Employee information will be retained for a period of seven years in accordance with Canada Customs and Revenue Agency Requirements.
  - e. Personal health information will be immediately destroyed when an individual chooses to leave a program of FHO.
  - f. Marketing information will be destroyed upon completion and analysis of collected information.
  - g. As otherwise may be stipulated in Provincial legislation.
13. Personal information that is used to make a decision about an individual will be maintained





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for a minimum of one year of time to allow the individual access to the information after the decision has been made.

14. FHO may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where FHO has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court or otherwise as permitted by applicable law.
15. Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, FHO will ensure that the hard drive is reformatted. All volunteers who, by virtue of their FHO duties and responsibilities, have access to personal information will sign Confidentiality Agreements; and when such information is held on portable storage media or on personal computer hard drives, these volunteers will be required to delete such information from their hard drives, and turn all portable storage devices containing the personal information over to FHO upon their relinquishing of such duties. A signed statement attesting to the fact that such deletions and information turnover have been completed will be required from all volunteers when the information is no longer needed for performing their duties, or when they have completed their FHO assignment(s), whichever comes first.

#### **Accuracy**

16. FHO will use accurate and up-to-date information as is necessary for the purposes for which it is to be used, to minimize the possibility that inappropriate information may be used to make a decision about an individual.

#### **Safeguards**

17. Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.
18. Employees with access to personal information will be made aware of the importance of maintaining personal information confidential and will be required to sign confidentiality agreements.
19. Every individual at all levels, who has access to personal information collected by FHO, will sign a Confidentiality Agreement which requires the individual to comply with this Privacy Policy. (BOD, coaches, volunteers organizing leagues, tournament directors, OSG volunteers, etc)

#### **Openness**

20. FHO will publicize information about its policies and practices relating to the management of personal information. This information is available through this policy, on FHO's web site or upon request by contacting the Privacy Officer.

#### **Individual Access**





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21. Upon written request, and with assistance from FHO, an individual may be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. As well, an individual is entitled to be informed of the source of the personal information along with an account of third parties to whom the information has been disclosed.
22. Requested information will be disclosed to the individual within thirty days of receipt of the written request at no cost to the individual, or at nominal cost relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.
23. If personal information is inaccurate or incomplete, it will be amended as required.
24. An individual may be denied access to his or her personal information if:
  - a. This information is prohibitively costly to provide;
  - b. The information contains references to other individuals;
  - c. The information cannot be disclosed for legal, security or commercial proprietary purposes;
  - d. The information is subject to solicitor-client or litigation privilege.
25. Upon refusal, FHO will inform the individual the reasons for the refusal and the associated provisions of PIPEDA.

**Challenging Compliance**

26. An individual may challenge FHO's compliance with this policy and PIPEDA, by submitting a challenge in writing.
27. Upon receipt of a written complaint, FHO will:
  - a. Record the date the complaint is received;
  - b. Notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
  - c. Acknowledge receipt of the complaint by way of telephone conversation and clarify the nature of the complaint;
  - d. Determine whether the complaint is frivolous or vexatious and within the jurisdiction of this Policy. If it is determined the complaint is frivolous or vexatious or outside the jurisdiction of this Policy, the complaint will be dismissed immediately. The Privacy Officer's decision to the acceptance or dismissal of the complaint may not be appealed.
  - e. If it is determined that the complaint is not frivolous and vexatious and within the jurisdiction of this Policy, the Privacy Officer will investigate the complaint and take corrective action to resolve the matter.
  - f. Notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures.

