

22nd annual Ottawa employment law client appreciation webinar



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Panelists



Catherine Coulter

Counsel, Ottawa
Employment and Labour

D +1 613 783 9660
catherine.coulter@dentons.com



Julia Dales

Associate, Ottawa
Employment and Labour

D +1 613 783 9687
julia.dales@dentons.com



Stephanie V. Lewis

Counsel, Ottawa
Employment and Labour

D +1 613 783 9651
stephanie.lewis@dentons.com



Kate Broer

Partner, Toronto
Global Client Development

D +1 416 863 4574
kate.broer@dentons.com

What's new and exciting in employment law?



You're kidding me, right?

Hawkes v. Max Aicher (North America) Ltd. (June 2021)(Ont. Div. Ct.)

- Instead of just calculating statutory severance based on a company's Ontario payroll, employers are now required to take into account all global payroll, including from parent companies in other jurisdictions.
- The net result is that employers with even just a couple of Ontario employees but large operations in other countries, may have to pay statutory severance to employees with 5 or more years of service.

Just cause termination provisions (aka “here we go again...”)

Rahman v. Cannon Design Architecture (Sept. 2021) (Ont. Superior Court)

- Does *Waksdale v. Swegon* apply, or not? What does this mean for all of the employment agreements that have been amended over the past year?
- Can an otherwise invalid termination for cause provision as per *Waksdale* suddenly become cured if the employee received legal advice and negotiated their termination provision?

Changes for federally regulated employers

- Under the Employment Equity Regulations (under the *Employment Equity Act*), by June 1, 2022, employers will be required to include aggregated wage gap information in their annual reporting on employment equity.
- As of January 1, 2021, employers are required to have a comprehensive new Respect in the Workplace Training program in place. ***All employees must take the training within 3 months of hire, and the training must be rolled out to existing employees by January 1, 2022.*** Finally, the training must be rolled out at least every 3 years after that.

COVID-19: I thought this would be over by now...

1. Worker Screening Tool: <https://covid-19.ontario.ca/screening/worker/>.

2. Vaccine exemptions:

College of Physicians and Surgeons of Ontario: *“Generally speaking, there are very few acceptable medical exemptions to the COVID-19 vaccination (e.g., an allergist/immunologist-confirmed severe allergy or anaphylactic reaction to a previous dose of a COVID-19 vaccine or to any of its components that cannot be mitigated; a diagnosed episode of myocarditis/pericarditis after receipt of an mRNA vaccine). Given the rarity of these exceptions, and in light of the fact that vaccines have been proven to be both safe and effective, any notes written for patients who qualify for a medical exemption need to clearly specify: (i) the reason they cannot be vaccinated against COVID-19 (i.e., document clear medical information that supports the exemption); and (ii) the effective time period for the medical reason (i.e., permanent or time-limited).”*

Ontario government:

https://health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/vaccine/medical_exemptions_to_vaccination.pdf

COVID-19: I thought this would be over by now...

2. Vaccine exemptions, con't.:

Ontario Human Rights Commission:

“Receiving a COVID-19 vaccine is voluntary. At the same time, the OHRC’s position is that a person who chooses not to be vaccinated based on personal preference does not have the right to accommodation under the Code. The OHRC is not aware of any tribunal or court decision that found a singular belief against vaccinations or masks amounted to a creed within the meaning of the Code.

While the Code prohibits discrimination based on creed, personal preferences or singular beliefs do not amount to a creed for the purposes of the Code.

Even if a person could show they were denied a service or employment because of a creed-based belief against vaccinations, the duty to accommodate does not necessarily require they be exempted from vaccine mandates, certification or COVID testing requirements. The duty to accommodate can be limited if it would significantly compromise health and safety amounting to undue hardship – such as during a pandemic.”

COVID-19: I thought this would be over by now...

3. Approved vaccines for Ontario employers:

“An individual is considered fully vaccinated if they have received: (i) The full series of a COVID-19 vaccine authorized by Health Canada, or any combination of such vaccines; or (ii) One or two doses of a COVID-19 vaccine not authorized by Health Canada, followed by one dose of a COVID-19 mRNA vaccine authorized by Health Canada; or (iii) Three doses of a COVID-19 vaccine not authorized by Health Canada; AND (iv) They received their final dose of the COVID-19 vaccine at least 14 days before providing the proof of being fully vaccinated.”

https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/guidance_proof_of_vaccination_for_businesses_and_organizations.pdf

COVID-19: I thought this would be over by now...

4. Ontario Safety Plan Builder

Announced by the Ontario government yesterday:

<https://www.workplacesafetyplanbuilder.labour.gov.on.ca/>

And just in case you didn't feel bad enough...

Russell v. The Brick Warehouse (2021) (Ont. Superior Court)

- Moral and aggravated damages may be awarded by the Ontario courts in cases where employers get things wrong in the termination letter, even if: (i) it's a termination without cause; (ii) the errors are not significant; and (iii) the errors are fixed by the employer when it goes to pay out the employee.

A bit of good news to end the session...

Lake v. La Presse (2021) (Ont. Superior Court)

- Courts may reduce notice periods due to improper mitigation when:
 - i. employees wait too long before beginning their job search (while it's reasonable for employees to wait a month to start looking, any further delay is not acceptable);
 - ii. employees aim too high for new jobs and unreasonably limit their job search; and
 - iii. employees don't apply to enough jobs.

Workplace investigations 101 – A primer

Tips and guidance for navigating workplace investigations



Before the investigation

- The best way to ensure that your company can smoothly navigate the workplace investigation process is to be prepared for when a complaint arrives.
- This includes:
 - Making sure your policies and procedures are up to date
 - Making sure all employees are trained on the policies and procedures and know how to bring a complaint forward
 - Consider training some internal team members on workplace investigations so they're ready in the event that a complaint is made

Did someone just complain?

- Complainant may not use the words “harassment” or “discrimination”
- Complaint may be informal

Did someone just complain?

- How to identify a complaint
 - Understand what constitutes workplace harassment, including sexual harassment, bullying, discrimination, and violence.
 - Discrimination means differential treatment based on grounds protected by human rights laws, including race, ancestry, age, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, marital status, family status or disability.
 - Workplace harassment is engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome
 - Includes workplace sexual harassment
 - Includes stalking
 - Can be one or a series of incidents or comments

Did someone just complain?

Under Ontario's *Occupational Health and Safety Act*, "workplace sexual harassment" means:

- a) engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or
- b) making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome

Did someone just complain?

Sexual Harassment:

Conduct of a sexual nature covers a broad range of actions and comments, such as:

- **physical contact**
examples include: forced sexual acts, pulling of clothing, hugging, kissing, brushing against, patting, pinching
- **gestures or actions with sexual content**
examples include: leering, ogling, exposing or fondling oneself, giving sexually explicit gifts or persistent romantic attention
- **verbal conduct**
examples include: threats for failure to comply with sexual demands, or promises of job benefits for complying, sexual proposition, persistent romantic propositions, suggestive comments
- **denigration or insults based on gender**
examples include: comments about physical attractiveness, sexist remarks

When the investigation begins/contacting the parties

- Establish the facts of a complaint:
 - Clarify what, exactly, the complainant is alleging happened.
 - Try to find out:
 - Dates of alleged incidents;
 - Locations of alleged incidents;
 - Times of alleged incidents;
 - The name(s) of the alleged harasser(s);
 - The names of witnesses, if any;
 - The nature of the harasser's behaviour; and
 - The nature of the complainant's own behaviour and actions.
- If possible, have an unwritten complaint committed to writing.
- When proceeding, be mindful of privacy concerns.
- Considerations re: when to advise the respondent.

When the investigation begins/contacting the parties

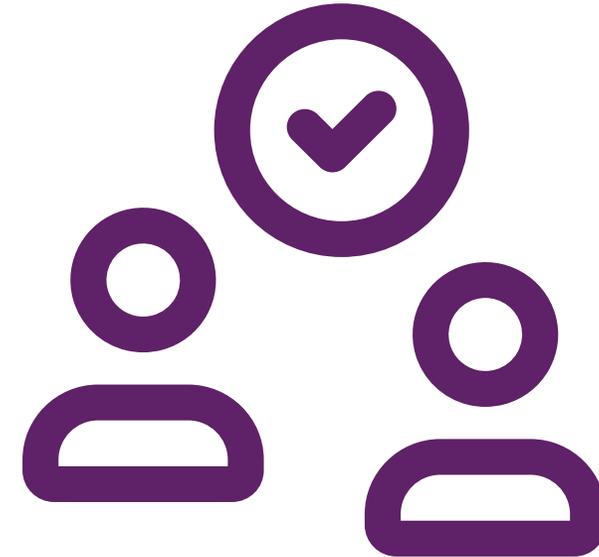
- Once you have all the details, before contacting the parties or taking any further steps, you will want to determine whether an investigation is necessary.
- Investigations are only necessary if allegations would constitute harassment if true.
- Not all dissatisfaction in a workplace constitutes harassment.
 - Workplace harassment does not include reasonable action taken by an employer or supervisor relating to the management and direction of the workers or of the workplace.
 - There is a difference between the normal abrasiveness of daily life in the workplace, including personal dislikes and personality conflicts; and harassment.
 - Allegations of personal harassment or workplace bullying should not be used to deal with personality conflicts, personal animosity, or dissatisfaction with an individual's work or management style.

When the investigation begins/contacting the parties

- Decide whether an investigation should be internal or external:
 - Consider:
 - Expertise
 - Experience
 - Actual or perceived neutrality
 - Speed
 - Efficiency
 - Resource allocation
 - The investigator should be at arm's length from the individuals involved.
 - If the complaint involves a senior employee, an external investigator is advisable.

Conducting interviews

- Location
- Order of interviews
- Timing
- Best practices during all interviews
- Requests for legal counsel to attend
- Review and acknowledgment of contents of notes
- Confidentiality
- Necessity of follow-up interviews



Concluding the investigation

- Review all evidence (including interviews and documents)
- Assess witness credibility:
 - Demeanor of the parties
 - Inherent plausibility of the testimony
 - Motive to falsify evidence
 - Corroboration
 - Past record
 - Spontaneity
 - Forthrightness
 - Observation
 - Memory capacity
- Make findings and draw conclusions based on policies and procedures

Concluding the investigation

- If the complaint is well-founded, determine appropriate next steps:
 - Relationship management?
 - Coaching?
 - Formal training?
 - Discipline?
 - Termination?



Concluding the investigation

- Advise the complainant and the respondent of the outcome.
- Provincially regulated employers do not need to provide a copy of the investigation report, which is employer property.

Post-investigation issues

- One party is unhappy with outcome – what now?
- Claims of bias or lack of neutrality
- Employee recourse
- Orders to re-investigate



What happens if I don't investigate properly?

Frolov v Mosregion Investment Corporation (2010 HRTO 1789)

- Employer's investigation was based on the sexist belief that older men sexually harass younger women, such that the employer did not take the applicant's complaint seriously
- Investigative time frame was found to be inappropriate since action was only taken after a third complaint was filed
- Investigative results were not communicated to the Applicant
- Applicant awarded \$7,500 in damages

What happens if I don't investigate properly?

Harriott v National Money Mart (2010 HRT0 353)

- Employer did not take applicant's complaint seriously or properly deal with her complaints
- Employer also did not take care of its employee and did not demonstrate the appropriate sensitivity to her concerns
- Human Rights Tribunal awarded \$30,000 in damages (\$7,500 for failure to investigate)

What happens if I don't investigate?

Bassanese v. German Canadian News Company Limited et al., 2019 ONSC 1343

- On April 17, 2018, Bassanese wrote to Perske about “being constantly harassed by [Dhanani] yelling and screaming at me ... telling me that I am an idiot and that I should be fired, etc, etc.” She added, **“I am sorry Chris. I have never ever filed a complaint but I want you to step in and make sure this never happens again.”**
- Perske wrote back to Bassanese the same day, on April 17, 2018, stating, “Sorry to hear that. We’re a little short-staffed this week (2 illnesses, 1 sick child and a vacation) but I’ll run it by Anne Marie, she’s our HR person.”

What happens if I don't investigate?

Bassanese v. German Canadian News Company Limited et al., 2019 ONSC 1343

- Employer did nothing to investigate.
- On June 21, 2018, Bassanese alleges Dhanani slapped her across the face three times.
- Bassanese's employment was terminated for cause that same day.

Findings

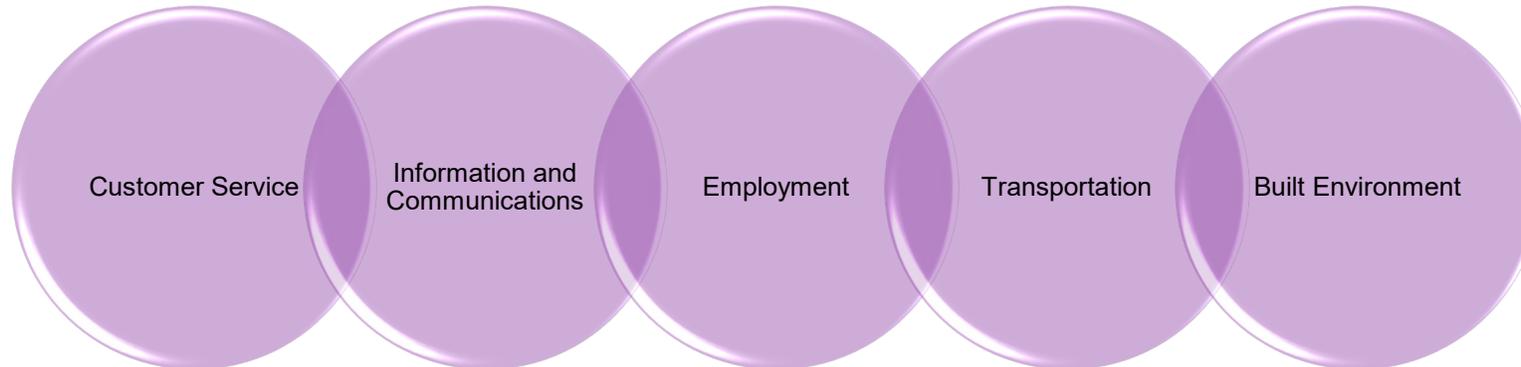
- Company did not file a Defence and was noted in default.
- Court awarded 19 months' notice PLUS \$65,000 for damages for assault and battery and punitive damages and \$10,000 in legal fees.

AODA & Pay Equity



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005 (AODA)

- Goal of the AODA was for Ontario to be fully accessible by 2025
- AODA set out accessibility standards for:



- The standards are set out in the Integrated Accessibility Standards Regulation (IASR)
- Organization's obligations under AODA depend on number of employees

1-19 Employees (“Small Organizations”)

Obligations:

- Accessibility policy including accessible customer service plan
- Training
- Accessible feedback process
- Accessible emergency response information, if applicable
- Provide accessible information on request
- Individualized emergency response procedure
- Notification in recruitment and offers of employment of availability for accommodation
- Notice of temporary disruption
- Take accessibility needs into account during employment (accommodation, performance management, redeployment, career development)
- Physical space accessibility (parking, service counters, waiting areas, queues)

20-49 Employees

Obligations:

- **Everything in prior slide *plus***
- File compliance report every three years, only regarding customer service accessibility (latest due date was June 30, 2021)

50+ Employees (“Large Organizations”)

Obligations:

- **Everything in prior slide *plus***
- File compliance report every three years on every standard applicable to org.
- Publically available Statement of Organizational Commitment
- Publically available Multi-Year Accessibility Plan (review/update every five years)
- Individual accommodation plans
- Return to work process
- Website published after Jan 1, 2012 must conform with WCAG 2.0 Level A & AA (except live video captioning and pre-recorded video audio descriptions)

Summary of obligations for Large Organizations

General:

- Training
- Publically available Statement of Organizational Commitment
- Publically available Multi-Year Accessibility Plan (review/update every 5 years)
- File compliance report every 3 years (latest due date was June 30, 2021)
- Accessibility policy including accessible customer service plan

Employment:

- Individual accommodation plans
- Return to work process
- Individualized emergency response procedure
- Notification in recruitment and offers of employment of availability for accommodation
- Take accessibility needs into account during employment (accommodation, performance management, redeployment, career dev.)

Information/Communications:

- Website published after Jan 1, 2012 must conform with WCAG 2.0 Level A & AA **Customer service**
- Accessible customer service plan
- Accessible feedback process
- Accessible emergency response information, if applicable
- Provide accessible information on request
- Notice of temporary disruption

Design of public spaces

- Physical space accessibility (parking, service counters, waiting areas, queues)

AODA Training

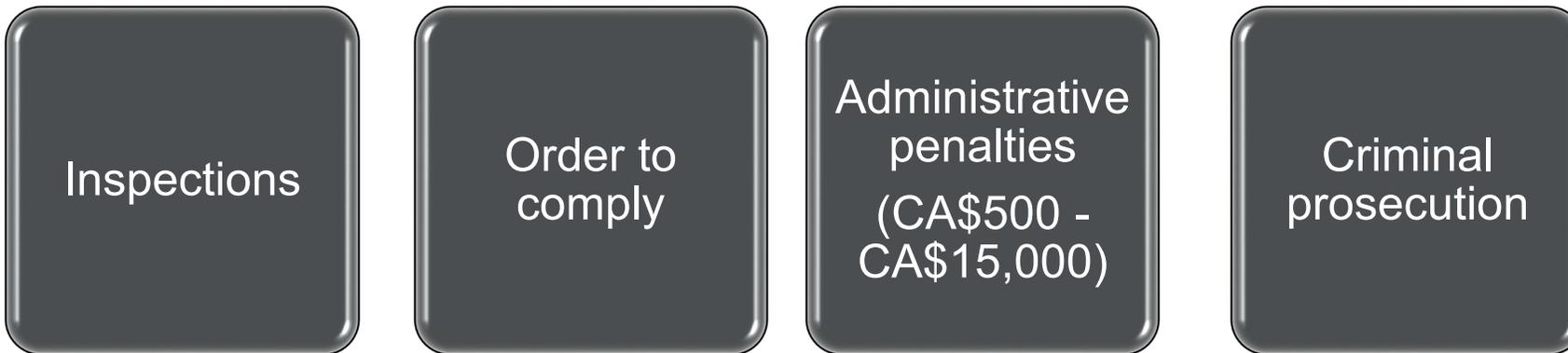
- Document dates training provided and number of employees trained
- Training topics must include:

1. Accessible customer service standards;

2. Disability provisions in the *Human Rights Code*; and

3. Any accessibility standard relevant to the individual's duties.

Penalties for non-compliance



Pay equity

The federal *Pay Equity Act* applies to federally regulated employers with 10 or more employees

The Manitoba, New Brunswick and Prince Edward Island *Pay Equity Act* apply only to public service employers and employees

Ontario's *Pay Equity Act* applies to all employers in Ontario, except employers in the private sector with less than 10 employees

Québec's *Pay Equity Act* applies to all employers in Québec with a minimum of 10 employees.

Pay equity

Ontario's *Employment Standards Act*, 2000 requires equal pay for equal work

Equal pay for equal work

=

Same pay for the same job

Pay equity

=

Equal pay for jobs that are different but of equal or comparable value based on skill, effort, responsibility and working conditions.

Pay equity

Steps to achieving pay equity:

Identify positions with similar duties, responsibilities, and qualifications that form a job class

Determine gender predominance of job classes

Determine value of work and calculate compensation associated with each gender-predominant job class

Compare compensation of male vs. female predominant male job classes

Identify where adjustments are required

Develop pay equity plan setting out how adjustments will be made

Apply the plan

Pay equity

Obligations for Employers with 10 or more employees under Ontario's *Pay Equity Act*:

Employers must establish and maintain pay equity

Employers must post pay equity notice in the workplace

Private sector employers that existed and had over 100 or more employees on January 1, 1988, had to create pay equity plans and post them

Pay equity

Obligations for Employers with 10 or more employees under Ontario's *Pay Equity Act*:

- If a Review Officer is responding to a complaint or conducting a random check they will require the following:
 - Posting of the [Notice of Requirement to Achieve and Maintain Pay Equity](#) in a prominent location in the workplace.
 - [Certificate of Posting](#)
 - The total number of employees and locations in Ontario, including a list of all staff with job titles and the gender of each incumbent (including full-time, part-time, contract, management and executive staff).
 - A list of all male and female job classes, including the male comparators, job values and job rates; or a listing of all jobs, gender of incumbent and pay rate.
 - If applicable, a copy of any collective agreements.

Enforcement

- Employees can file complaints with the Ontario pay equity commission and once the commission's review officer has made their determination, the complainant can request a hearing before the Pay Equity Hearings Tribunal with respect to the decision made.
- Penalties of up to CA\$50,000 can be levied for intimidating a person who is exercising their rights to pay equity, or failing to comply with an order of the Hearings Tribunal.

Federal Pay Equity

Federal employers with 10 or more EEs as of August 31, 2021 must:

Post notice of obligations & draft plan within 60 days of Aug 31, 2021

Develop & post final pay equity plan within 3 years

Review and update on 5th anniversary of final posting

Annual statement to Pay Equity Commissioner

Pay Equity Committee required if 100 or more EEs, or 10-99 if unionized

Penalties: CA\$30,000 to CA\$50,000

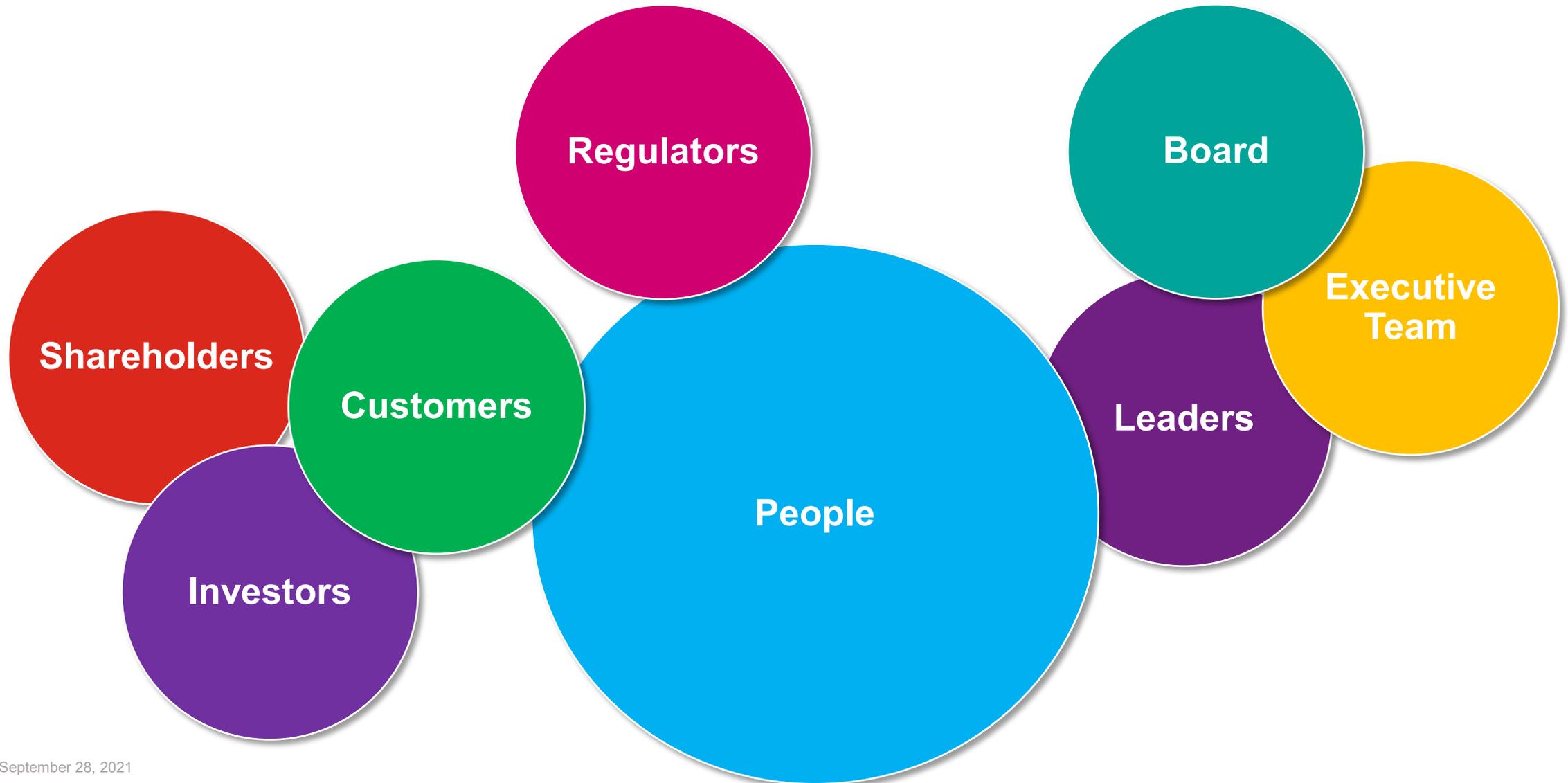
Inclusion & Diversity initiatives in your workplace



The background is a solid purple color with several overlapping, semi-transparent circles of varying shades of purple. The circles are positioned in the upper right and lower right areas of the frame, creating a modern, abstract design.

The Inclusion & Diversity imperative and positioning your organization for success

Key stakeholder groups



Key concepts

Representation = How many

Diversity = Combination of characteristics that make each of us unique

Inclusion = “Making diversity count”

Equity v equality = Equity recognizes the different circumstances of each person and then allocates resources and opportunities to yield an equal outcome

Under-represented/equity-seeking group

Allyship

Building an effective strategy

Treat inclusion and diversity like any other business imperative



You need to know where you are to know where you're headed

What are examples of some Legal Requirements in Ontario when it comes to Inclusion & Diversity?

The Law (Ontario)

- **Human Rights Code:** Provides for the right to “equal treatment with respect to employment”. That covers such things as applying for a job, being recruited, training, transfers, promotions, terms of apprenticeship, dismissal and layoffs. These protections apply with respect to protected grounds such as disability, age, ancestry, colour, race, citizenship, ethnic origin, place of origin, creed (or religion), family status, sex, gender identity, gender expression, sexual orientation, and record of offences.
- **Accessibility for Ontarians with Disabilities Act (AODA):** Works together with the Ontario Human Rights Code. All employers must comply. AODA includes accessibility standards in a number of areas, including employment.
- **OHRC Policy on Removing the Canadian Experience Barrier:** In 2013, the Ontario Human Rights Commission released its Policy on Removing the Canadian Experience Barrier. The Policy effectively states that a strict requirement for “Canadian [work or accreditation] experience” is discriminatory and can only be used in very limited circumstances.

The Law (Ontario), con't.

- **Pay Equity Act:** Requires employers to review jobs classes in order to make sure that female job classes are paid comparably to male job classes.
- **Canada Business Corporations Act (CBCA):** Ontario companies which are incorporated under the CBCA must provide shareholders with details regarding their corporate policies on diversity among the board of directors and among senior management. The aspects of diversity which must be reported on relate to the representation of women, indigenous persons, visible minorities, and persons with disabilities, together with any other diverse groups which companies choose to report on. In addition, for those companies which are not incorporated under the CBCA, provincial securities regulators across the country require disclosure in relation to gender diversity.

Human Rights 101

- Human rights legislation across Canada provides for so-called “Special Programs”, which are akin to employment equity in the federal sphere or affirmative action in the U.S., and expressly permit for the favoring of certain groups of individuals.
- For example, Section 2 of the *Employment Equity Act (Canada)* provides as follows: *“The purpose of this Act is to achieve equality in the workplace so that no person shall be denied employment opportunities or benefits for reasons unrelated to ability and, in the fulfilment of that goal, to correct the conditions of disadvantage in employment experienced by **women, Aboriginal peoples, persons with disabilities and members of visible minorities** by giving effect to the principle that employment equity means more than treating persons in the same way but also requires special measures and the accommodation of differences.”*
- In some provinces, special programs are formalized and require approval; in other provinces, they are not.
- What about Ontario?

Formal special programs in Canada

Ontario

Human Rights Code (Ontario), section 14

Application to the Ontario Human Rights Commission for designation for approval or for approval with conditions to make modifications to meet the requirements of a special program.

Commission may make inquiries into the programs on its own initiative.

Designation expires 5 years after the day it was issued or at an earlier time as specified by the Commission and may be renewed upon application to the Commission

If an application for designation of a special program has been considered and refused by the Commission, the company may submit this decision to the Ontario Human Rights Tribunal by way of appeal.

Human Rights summary

- Regardless of province or territory, employers can collect inclusion & diversity related information for the purpose of establishing a Special Program to correct systemic disadvantages experienced by specified groups.
- Some provinces/territories have formal Special Programs (i.e. Ontario), where program approval is required by Human Rights Commissions; other provinces/territories permit for Special Programs on an informal basis and without approval being required.
- Special Programs are a great way to ensure greater equity in the workplace, but are not required. Some employers simply want to collect inclusion & diversity information for the purposes of being able to respond to third party inquiries for diversity information.
- Whether or not a Special Program is instituted, organizations cannot collect sensitive personal information about individuals without first obtaining consent as to the purposes for the collection, use, and any disclosure of that information.
- This then takes us to privacy law considerations.

Privacy law 101

- The original and primary piece of privacy legislation in Canada is the *Personal Information Protection and Electronic Documents Act* (Canada) (“PIPEDA”). PIPEDA governs the collection, use and disclosure of personal information for federally regulated employers (i.e. telecoms, banks, railways), as well as certain defined federal institutions. These institutions must ensure the protection of personal information of employees as well as third parties.
- Three other provinces have enacted substantially similar legislation (B.C., Alberta, and Quebec).
- All other provinces are bound by PIPEDA.
- Employee personal information is protected under the B.C., Alberta and Quebec privacy legislation. Although **employee** personal information is protected under PIPEDA for federally regulated employers, it is **not** protected under PIPEDA for provincially regulated employers that are otherwise subject to it.
- Therefore, Ontario employers are not bound by PIPEDA when it comes to the collection, use and disclosure of **employee** personal information.
- All the same, and particularly for organizations that have employees in more than one province, it is best to default to the highest standard. This is also due to the potential risk of a common law tort claim for breach of privacy under the tort of “intrusion upon seclusion”.
- In summary, it’s a good idea for organizations to defer to the protections standards set out under PIPEDA when collecting, using & disclosing diversity information.

Requirements under PIPEDA

Consent

4.2 Principle 2 – Identifying Purposes

- Identify and document the purposes for which personal information is collected
- Identified purposes should be specified at or before the time of collection to the individual, either orally or written, depending on how the information is to be collected
- If a new purpose arises, you need to obtain fresh consent

4.3 Principle 3 – Consent

- Consent is required for the collection of personal information and the subsequent use or disclosure of this information
- Requires “knowledge and consent”
- Reasonable expectations of the individual are relevant
- May withdrawal consent at any time

Requirements under PIPEDA, con't.

Collection	<p>4.4 Principle 4 – Limiting Collection</p> <ul style="list-style-type: none">• Limited to that which is necessary for the purpose identified by the organization• Collected in fair and lawful means
Use and Disclosure	<p>4.5 Principle 5 – Limiting Use, Disclosure, and Retention</p> <ul style="list-style-type: none">• Limited to the purposes for which it was collected (except with fresh consent of the individual or as required by law)
Storage	<p>4.5 Principle 5 – Limiting Use, Disclosure, and Retention</p> <ul style="list-style-type: none">• Personal information shall only be retained as long as necessary for the fulfillment of the purposes• Personal information that is no longer required to fulfil the identified purposes should be destroyed, erased, or made anonymous

Privacy law summary

- Think about the purposes for which the company will be collecting and using the diversity information, and to whom it will be disclosed. In Annual Reports or other public disclosure? Internally only?
- CONSENT, CONSENT, CONSENT! If you want to collect, use and disclose diversity information, let individuals know for what purpose you're collecting and using diversity information, and to whom it may be disclosed. Obtain their express consent by way of a signature on an application form, a check box on a survey, or some other written means.
 - If diversity information is required for the purposes of the company monitoring and improving on its inclusion and diversity efforts, let employees know that.
- Consider how long the company needs to retain the information. If it's for comparison purposes year over year, to improve the company's diversity profile, then make that clear when you collect it.
- Do not retain the information for longer than it is needed.

Privacy law summary, con't.

- In some cases, companies will only require diversity information on an aggregated basis. If that is the case, let individuals know that their personal information will be anonymized.
- On the other hand, if diversity information is being collected so that the company can seek out particular diversity traits for hiring purposes (i.e. akin to affirmative action in the U.S.), let individuals know that their personal information will not be anonymized.
- Ensure that non-anonymized information can only be accessed by those in the organization with a need to know (i.e. the people who collect and protect the information).
- Ensure that the information is kept secure.
- Ensure that when the information is no longer needed for the purposes for which it was collected, it is destroyed.
- Appoint a Privacy Officer in your workplace, to whom all questions about personal information protection can be directed.
- Create a Privacy Policy for your organization.
- Ensure that your Privacy Policy includes information on how individuals can review and amend their personal information.
- Review the Privacy Guide for Business, created by the Office of the Privacy Commissioner of Canada: https://www.priv.gc.ca/media/2038/guide_org_e.pdf.

Thank you



Catherine Coulter

Counsel, Ottawa
Employment and Labour

D +1 613 783 9660

catherine.coulter@dentons.com



Julia Dales

Associate, Ottawa
Employment and Labour

D +1 613 783 9687

julia.dales@dentons.com



Stephanie V. Lewis

Counsel, Ottawa
Employment and Labour

D +1 613 783 9651

stephanie.lewis@dentons.com



Kate Broer

Partner, Toronto
Global Client Development

D +1 416 863 4574

kate.broer@dentons.com

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