



EMPLOYMENT ASSISTANCE SERVICES (EAS) PROGRAM'S POLICY AND PROCEDURES

January 11, 2017

***To Increase Urban Aboriginal Participation in the Labour
Market***

Aboriginal Community Career & Employment Services Society
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TABLE OF CONTENTS

1. Introduction
2. Policies
 - a. **EMPLOYMENT & TRAINING PROGRAM POLICIES (NOVEMBER 30, 2016)**
 - b. **FUNDING PROCESSES (November 30, 2016)**
 - c. **APPEAL PROCEDURES (November 30, 2016)**
 - d. **RIGHTS AND RESPONSIBILITIES OF CLIENT AND SERVICE PROVIDERS**
 - e. **SERVICE LEVEL AGREEMENTS GUIDELINES (January 2017)**
3. Employment Assistance Services Program Documents
 - a. **ADMINISTRATIVE PROCEDURES**
 - i. Reception/Administration
 - ii. Client Intake
 - iii. Employment Readiness Scale
 - iv. Client Booking and Transfers
 - v. Resource Services
 - vi. Resource Area and Job Gateway
 - vii. Resource Area
 - viii. Other Duties
 - b. **CLIENT SERVICE WORKER PROCEDURES**
 - i. Training Involvement
 - ii. ARMs Data Entry
 - iii. Client's Success
 - iv. Recruitment
 - v. Employment Readiness Scale
 - vi. Clerical Support
 - vii. Community Information
 - viii. Networking
 - ix. Reporting
 - x. Staff Meetings
 - c. **EMPLOYMENT ADVISORS PROCEDURES**
 - i. Clients First Meeting
 - ii. Employment Planning
 - iii. Employment Planning
 - iv. Job coaching
 - v. Financial Assessments
 - vi. Case Management
 - vii. Client Training Follow Up
 - viii. Networking
 - ix. Workshops
 - x. Other Duties

INTRODUCTION

ACCESS is the place to start building your future today. We deliver a unique and diverse assortment of education, training, counselling, support and financial services designed to help members of the urban Aboriginal community overcome barriers that may stand in the way of success and self-sufficiency. We develop partnerships with organizations and companies that match their needs to the needs of our Aboriginal clients creating a win, win situation for both partners.

ACCESS is an Aboriginal Skills and Employment Training Strategy (ASETS) holder. We are the only urban ASETS in British Columbia serving urban Aboriginal clients throughout Metro Vancouver. Our mandate is to enhance human resource development and the sustainable capacity of the urban Aboriginal population in Metro Vancouver through the provision of employment and training services. ACCESS is responsible and accountable for the programming, delivery, and reporting of results to government and community stakeholders.

Our core values are **Respect, Honour, Kindness** and **Sharing** and we treat our clients according to those values.

We envision an Urban Aboriginal Community empowered through culture, wellness, achievement, and self-sufficiency. ACCESS offers customized employment and training services designed specifically to provide urban Aboriginal people with the education and skills they require to compete equally and effectively in today's job market.

Our programs are on-going through out the year. Clients need to register at our Employment Assistance office and meet with a counsellor to help determine eligibility and how we can best meet their needs.

Our programs are open to all aboriginal people all ages from youth to older workers. We look at your skills and interests and help create an action plan for building your future.

For convenience and ease of access for our clients, we have various locations throughout Metro Vancouver including Surrey, New Westminster, Downtown East Side, the Vancouver Friendship Centre and our Administration office and Trades office in West Vancouver.

ACCESS is funded by Service Canada and the Province of BC.

TRAINING PROGRAM POLICIES

Preamble

ACCESS is the Aboriginal Skills, Employment and Training Strategy (ASETS) agreement holder for the Greater Vancouver area, with responsibilities and obligations to provide employment and training services for Aboriginal people in the Metro Vancouver area. The Employment and Training programs are the key mechanisms with which ACCESS can fund and direct its limited resources to build the capacity and careers of its clients.

As the ASETS holder, ACCESS is committed to supporting the policies as set out in the ASETS Guideline on Eligible Expenses, as established by Employment and Social Development Canada (ESDC).

ACCESS: Vision

ACCESS envisions an urban Aboriginal community empowered through culture, wellness, achievement, and self-sufficiency.

ACCESS: Mission

Increasing Urban Aboriginal Peoples Participation in the Labour Market

ACCESS Core Values



Core Values

- **Respect** yourself and each other
- **Honour** through dignity, honesty and accountability
- **Sharing** our experiences and wisdom
- **Kindness** in our actions



ACCESS: Business Philosophy

ACCESS delivers a holistic blend of employment training and support services that assist urban Aboriginal people to gain access to meaningful opportunities and employment. Programs and services are carefully positioned to empower Metro Vancouver urban Aboriginal people to achieve their individual aspirations of self-reliance.

ACCESS: Mandate

ACCESS serves to enhance human resource development and the sustainable capacity of the urban Aboriginal population in Metro Vancouver through the provision of employment and training services. Under the terms of its agreement, ACCESS is responsible and accountable for the programming, delivery, and reporting of results to government and community stakeholders.

ACCESS is committed to the delivery of training initiatives that reflect the diversity of the community. Partners include Aboriginal service organizations, educational institutions, all levels of government, and strategic business and industry sectors. Success is measured based on human impact as well as statistical indicators.

The dedication of staff, management, and board is surpassed only by the enthusiasm of the members of the community who benefit from ACCESS programs and services.

ACCESS: Principles

The Management Team of ACCESS identified the following principles with which the Employment & Training Program policies are to be developed and interpreted:

- Client-focused: common sense, simple policies, timely, with improved service
- Respect Client's preferences and needs
- Respect funders requirements and priorities: demand-driven and partnership
- Consistent operating procedures for Clients across all ACCESS offices.
- Flexible to meet specific needs of individuals
- Fiscal balance – support more Clients
- Fairness – equal opportunity to receive supports

1.0 Responsibility

- 1) The Advisor has the responsibility of assessing and recommending funding requests for individual training interventions.
- 2) The Advisor's decision-making is supported by these principles, policies, and guidelines, and by the Department Manager.
- 3) All eligible costs should take into consideration funding from other sources, including the Client.

2.0 Eligible Clients

ESDC sets the client eligibility criteria. Clients must meet all of the eligibility criteria listed below:

- 1) Aboriginal identity – self-declaration.
- 2) Canadian citizen or legally entitled to work in Canada.

- 3) 15 years and older.
- 4) Metro Vancouver address.

Guidelines

- The requirement for a Metro Vancouver address can consider a referral from another ASETS agreement holder, or a First Nation.

3.0 Eligible Training

Clients can be funded for training in order to enhance their employability.

3.1 Training Program

The training program should meet the criteria below:

- 1) The training program reflects the Client's career objectives as documented in the action plan developed in collaboration with ACCESS Advisors.
- 2) The training program is not otherwise funded by another agency, although partnerships can be considered.
- 3) Eligible vocational training programs leading to employment include post-secondary (college and university) diplomas and certificates, up to two years in length.
 - a) Post-secondary degree programs longer than two years are not eligible.
- 4) The training program results in a certification.
 - a) Training programs without certification can be considered if it meets the expressed needs of employers.
- 5) The training program and certification is required/preferred by employers (demand-driven).
 - a) The training results in an industry-recognized certificate.
 - b) The training and certification enhances the client's ability to attain a job.
- 6) Clients must be able to meet the pre-requisites of the training program and institution.
 - a) ACCESS can support the Client to meet the pre-requisite criteria.
- 7) The following types of training programs are eligible for consideration:
 - a) Apprenticeship - trades foundation and/or apprenticeship technical training are eligible, and are reviewed annually for the length of the apprenticeship. Apprenticeship programs must be accredited by the Industry Training Authority.

- b) Online training courses longer than 5 days must be preapproved by the Director of Employment Services.
- c) Part-Time Individual Training – may be considered under special circumstances and must be pre-approved by the Director of Employment Services.
- d) Short-term Training – are eligible for industry-preferred/required certifications such as WHIMIS, First Aid, Serving It Right, etc.

3.2 Duration of Training

- 1) Clients can receive support for training up to two years' maximum.
- 2) Regular check-ins are required.
- 3) Special consideration can be made for a client who requires upgrading for Essential Skills, Adult Basic Education, pre-requisites, or other similar circumstances.
- 4) Special considerations can be made for a program that has a co-op component.
- 5) Trades programs involving multi-year apprenticeships and technical training are eligible with regular reviews.

3.3 Training Providers

- 1) Training providers eligible for funding must be approved by the EAS Director. Preference will be given to public institutions and union training schools. Eligible institutions may include:
 - a) Public institutions
 - b) Private post-secondary institutions, including: for-profit companies, not-for-profit organizations that are registered with the Private Career Training Institutions Agency of BC (PCTIA).
 - c) Delivery agents recognized by industry (i.e. RCMP and Vancouver Police Department summer school program).
 - d) Trades program must be accredited by the Industry Training Authority (ITA)
 - e) Programs not fitting the criteria may be considered and must be pre-approved by the EAS Director.

Guidelines

- For training programs or institutions unfamiliar to ACCESS staff, the Employment Advisor will be required to verify the requirement/preference by employers for the training/certification in question.

4.0 Eligible Costs

4.1 Tuition, Books, Exams

- 1) Eligible costs include: tuition, required text books, course materials and exam fees.
 - a) Other costs required by the training program, such as personal protective equipment, may be considered with the appropriate documentation.
- 2) Cost of tuition and books are paid directly to the training institutions.
 - a) The costs can be paid directly to the Client in special circumstances, after submission of original receipts.

Guidelines

- All financial funding is subject to taxation, and all clients are informed by contract.
- Purchase of assets for individual clients (e.g. laptops, computers, software, cell phones, cameras, work gear etc.) is not an eligible expense.
- If a client is in overpayment, future funding is not permitted.

4.2 Living Allowance

- 1) Living expenses will be considered after all other sources have been exhausted; i.e., Band funding, Employment Insurance, Income Assistance, bursaries, etc.
- 2) The payment of a Living Allowance is dependent upon the timely completion of the Attendance Report.
- 3) Eligible living expenses include rent, utilities, and food.
 - a) Transportation costs are covered in the section below.
- 4) A Living Allowance can be provided at a standard rate for each client, based on the number of verified dependents:
 - a) Clients with no (0) dependents can receive \$800 per month.
 - b) Clients with one (1) dependent can receive \$1,000 per month.
 - c) Clients with two (2) dependents can receive \$1,200 per month.
 - d) Clients with three (3) dependents can receive \$1,400 per month.
 - e) Clients with four (4+) dependents or more can receive \$1,500 per month.
 - f) Clients with no dependents, living with their parents, can receive \$200 per month.

- g) Clients on Income Assistance, regardless of the number of dependents, can receive \$100 per month.
- 5) The payment of a Living Allowance is made to the Client at the end of each month of training.
 - a) For training ending on the 7th day of the month or later, the monthly Living Allowance can be paid in full, based on confirmation of job search.
 - b) For training ending on the 6th day of the month or earlier, the monthly Living Allowance will be paid at 50%.

4.3 Transportation and Child Care

- 1) Clients are eligible for transportation funding up to the cash equivalent of a 3-Zone Monthly Transit Pass.
 - a) The Client can direct these funds to a bus pass, gas, or other transportation methods.
- 2) Transportation costs for short-term purposes (i.e., short-term training, job search, first job before pay period) are available as a loaded Compass Card.
 - a) Up to 20 transit tickets per year can be issued per client, usually 2-3 at a time, depending upon circumstances.
- 3) Transportation costs for training and employment outside of Metro Vancouver must be pre-approved by the EAS Director.
- 4) Childcare costs that are required for training can be considered in addition to the Monthly Living Allowance, based upon demonstrated need.
 - a) Clients must first access the BC Day Care Subsidy Program and/or any other available funds for childcare, including family.

5.0 Applying for Funding

ACCESS is committed to processing the funding applications as soon as possible, and will work with the Client to understand the requirements and to access all of the required information.

- 1) Clients must present all required documentation and information in order to submit a funding application. Incomplete applications may not be considered.
- 2) In the case of Employment Insurance (EI) eligible clients or clients in receipt of Income Assistance (IA), verification of eligibility must be completed and documented prior to the approval and commencement of funding.
 - a) Allow EI and IA to take 6 to 8 weeks

- 3) Clients should apply for funding in a timely manner, at least 4-6 weeks prior to the commencement of the training requested.
 - a) ACCESS is not able to back-date funds for training.
- 4) Clients should allow at least 5 business days for processing a request for funding once the formal application is made. This may be longer during times of high demand.
 - a) Clients applying with less than 5 business days before the start of the program will only be considered once all of the applications received prior to the 5-day deadline have been processed.

6.0 Approving and Declining Funding Requests

6.1 Approving Funding Requests

- 1) Clients will be contacted when the funding has been approved.
- 2) Clients may be required to contact ACCESS (in-person or otherwise) to finalize the funding approval.
- 3) Clients and training institutions assume all financial risk until they are informed in writing that a funding request has been approved.
- 4) Clients and institutions will not be reimbursed for costs associated with the training program if the costs have not specifically been preapproved in advance by Director of Employment Services.

Guidelines

- Clients, who exhibit signs of trying to take successive training programs, rather than working, may not be considered for funding.
- If the Client withdraws from a training intervention without notice to ACCESS, the client may be liable for repayment, and may not be considered for future funding.

6.2 Declining Funding Requests

- 1) The Client will be advised in writing of the decision to decline funding within five (5) working days of the decision.
- 2) The Client will also be informed of the appeal process.
- 3) The Client will be provided a specific reason for the decision to decline funding, which may include:
 - a) Insufficient funding available (no appeal permitted).
 - b) The Client does not meet the Client Eligibility Criteria in Section 2.0.
 - c) The training program is not employment related as set out in Section 3.0.

- d) The training request is not supported by labour-market information as set out in Section 3.0.
- e) The training is not accredited or does not provide certification recognized by industry as set out in Section 3.0.
- f) The Client has indicated they do not intend to pursue employment upon completion of training.
- g) The Client has not met entry requirement of the requested training program or institution.
- h) The Client missed deadline or failed to provide necessary lead time.
- i) The supporting documentation is incomplete at commencement of training.
- j) The Client is in overpayment situation with ACCESS or another ASET holder.

FUNDING PROCESSING PROCEDURE

Initial contact with a client requires the completion of a Personal Information Form (PIF) and their participation in needs assessment counseling with a recognized employment advisor as prescribed by ACCESS;

Information obtained through this process contributes to the preparation of an action plan and a recommendation for funding, if applicable. This includes but is not limited to the following:

- Client's educational history;
- Social and economic background/factors;
- Work experience and job skills;
- Personal motivation letter
- Interests with respect to employment;
- Ability to meet training pre-requisites;
- Occupational and job requirements;
- Labour market opportunities;
- Client's mobility for training.

Recommendation for funding requires the completion of an ACCESS Funding Package and is assigned an ARMS Client number;

Once the ACCESS Funding Package is complete and is accompanied with all supporting documentation, the employment advisor can choose to make a recommendation for funding;

Recommendations are processed on a first come, first served basis;

For Employment Insurance clients, verification of EI eligibility, done through the internal ARO Link process must be received, documented and on file prior to considering approval;

Verification of income regardless of source must be established and documented prior to funding recommendation;

The employment advisor has the overall responsibility of interviewing, assessing, and when appropriate, recommending individual funding. The Director of EAS is the designated authority to approved ACCESS Funding Packages. The employment advisor will advise the client of the outcome of their request within 5 days from the date of receipt of a completed Funding Package and all supporting documentation;

If the request is deemed as unusual or a high risk by the employment advisor, it may be referred to the Director of EAS for Pre-Screening, if applicable, then will be referred for final review and approval,

When a Funding Application is being presented to the Director of EAS for review and approval, the following process applies:

- Requests presented to the Director of EAS are referred to by ARMS file number to protect confidentiality and ensure impartiality;
- The employment advisor prepares the Funding Package for presentation to the Director of EAS, where the requests are reviewed and assessed;
- Each request for review is evaluated based on the eligibility criteria of the program in question;
- The file number, decision, and rationale for the decision, is recorded in the case notes as well as documented in the comment section in ARMS;
- The employment advisor must inform the clients of the decision in writing, within five (5) working days of the decision;
- Acceptance of any funding request is subject to availability of financial resources.

If a decision lies outside the approval limits of the Director of EAS, the recommendation for funding is to be reviewed by ACCESS CEO/President;

When a recommendation has been approved, a letter of notification of sponsorship is provided to the client, in which a copy must be signed by the client and returned to the file (indicating mutual acceptance of the terms and conditions of the approved funding);

When a recommendation has not been approved, the employment advisor will inform the applicant in writing of the reasons for decline, and will provide the applicant with information concerning the appeal process; which is outlined in the Funding Appeal procedures.

Client File Requirements

The Employment Advisor must attach case notes to all files, as well as inserting these notes into the comment section of ARMS. These case notes must provide: employment activities done by the client, meetings and telephone conversations, follow-up and monitoring results, and completion results at the conclusion of the intervention.

Client File Checklist

- 3.1 Initial Required Core Forms
 - 3.1.1 Participant Information Form;(PIF)
 - 3.1.2 Client Declaration & Release Form;
 - 3.1.3 LDMA/Employment Insurance Eligibility Form;
 - 3.1.4 Client Action Plan;
 - 3.1.5 Assessments
- 3.2 Supporting Forms

ACCESS PROGRAM'S POLICY AND PROCEDURES

- School Acceptance Forms (case notes);
- Letter of Agreement/Notification of Sponsorship (or decline);
- LDMA
- Letter of Confirmation Form (where applicable);
- Invoices, receipts, disbursement records and documentation must also be maintained in the file;
- Monthly attendance reports (if applicable);
- A completion/final check of file maintenance must be completed and documented before each file is closed.

4.0 Client Tracking, Monitoring & Reporting Requirements

- 4.1 ARMS data must be recorded (paper file copy kept in client file) and entered into the ARMS computer database system;
- 4.2 A regular system of monitoring each client's progress and attendance in training must be implemented and documented;
- 4.3 Client follow-up for the purposes of obtaining results and closing the file must be conducted under the supervision of the employment advisor within twelve (12) weeks of the completion of the training intervention. Results and outcome must be documented in the file and in ARMS. At this time, it must be ensured that any outstanding documentation is collected, if applicable;
- 4.4 The employment advisor must submit a quarterly narrative report to the Director of EAS. The Director of EAS will provide a copy of the final report (quarterly report) to the ACCESS CEO/President. ACCESS staff will be allowed to view copies of quarterly reports;
- 4.5 The information to be contained in the quarterly reports is as follows:
 - 4.5.1 Data about the number of clients served in the quarter, male, female, youth, disabled, income assistance recipients;
 - 4.5.2 Number of clients in individual training interventions, self-employment assistance interventions, targeted wage subsidies, job creation partnerships, employment assistance interventions, projects;
 - 4.5.3 New clients served;
 - 4.5.4 Continued clients;
 - 4.5.5 Clients who have finished their interventions;
 - 4.5.6 Employed Stats or Returned to School
 - 4.5.7 Average cost per client;
 - 4.5.8 Activities around partnerships and clients;
 - 4.5.9 Update on any projects running;

- 4.5.10 Board/Committee/Community meetings;
- 4.5.11 Any training participated in by staff;
- 4.5.12 Updates of past ventures stated in previous reports;
- 4.5.13 Any other comments pertinent to the employment and training program;
- 4.5.14 Closed files

FUNDING APPEAL PROCEDURE

All Client funding applicants which have been denied by ACCESS shall be provided with a written letter of explanation outlining the reason(s) for Client funding rejection. Such applicants retain the right to appeal the decision(s) of ACCESS. The client has 20 working days to appeal the decision.

The Client's Employment Advisor must first notify the Client in writing of the decision for denial of funding; this written notification of denial must be sent out within 5 working days of the decision.

- STEP 1 –** The Employment Advisor must go over their notes from the Funding Application Review with the Director of EAS regarding the denial.
- STEP 2 –** The Employment Advisor must refer back to the section of the funding policy (6.2.3) that reflects the reason(s) for denial.
- STEP 3 –** The Employment Advisor must use the Denial Letter template and insert the reason(s) for denial.

RE: SPONSORSHIP

We are writing this letter regarding your recent application with ACCESS for sponsorship. This letter is to advise you that ACCESS is not able to meet your request for funding at this time.

Upon thorough assessment, our office has come to the decision that your application for funding has been denied according to Access Employment & Training Program Policies.

Section 1.1 Eligible clients are normally unemployed, however they may also participate if they are under-employed, self-employed, or if their work environment is subject to change or elimination due to technological or market change.

Section 1.5 The client has not demonstrated financial need.

Section 5.5 Clients should allow four to six weeks for processing a request for funding once all required documents is submitted. In the case of EI eligible clients or clients in receipt of Income Assistance, verification of eligibility must be completed and documented prior to the approval and commencement of funding.

ACCESS wishes you success in securing alternate funding to complete your Training program. If you wish to appeal this decision, you must contact Tamli Omesoon, Director of Employment Services, Suite 110, 1607 East Hastings Street, Vancouver, BC V5L 1S7 within 20 working days indicating their intent to appeal following the receipt of the rejection or deferral letter from ACCESS.

We wish you success in attaining your future endeavors.

Sincerely,

- STEP 4 –** The Employment Advisor will put the denial letter on letterhead and sign.

- STEP 5 –** The Employment Advisor will make a copy for the file and mail original letter to client.

- STEP 6 –** The Employment Advisor will create a Bring Forward in Outlook with cc to the Client Service Worker and if no response in 20 days, the Employment Advisor can close the file.



The screenshot shows an Outlook calendar interface. A 'Bring Forward' entry is visible, indicating a meeting or task that has been rescheduled. The entry includes details such as the subject, date, time, and location. The interface also shows a list of contacts and a task list on the right side.

If the client wants to provide an Appeal, this needs to be within the 20 working days of the notice of denial.

STEP 1 – The client should make an appeal in writing to:

Attention: ACCESS, Director of Employment Services,
Suite 110, 1607 East Hastings Street
Vancouver, BC V5L 1S7

STEP 2 – The Employment Advisor must ensure that the appeal letter is date stamped within 20 working days of notification of denial. The appeal letter must explain their intent to appeal, following the receipt of the denial letter from ACCESS.

STEP 3 - Upon the receipt of the client's appeal letter, the Employment Advisor will provide the clients file to the EAS Director for review. Once reviewed, the EAS Director will provide a written rationale for the decision whether the appeal is upheld or withdrawn. This letter will be provided to the Employment Advisor for their file and client.

STEP 4 – Should the denial of funding be upheld; the client has the right to request that the appeal be brought forward to ACCESS President/CEO.

STEP 5 - The appeal package (Denial Letter, Appeal Letter and EAS Director Letter) will then be referred to the ACCESS President/CEO for review and response.

RIGHTS AND RESPONSIBILITIES OF CLIENTS AND ACCESS (EAS)

Every person that applies for or is receiving employment services has certain rights and responsibilities.

RIGHTS

ACCESS clients have the following Rights

- ✓ To make application when they believe they are in need
- ✓ To be given the information and assistance needed for them to make proper application for the program
- ✓ To have all personal information treated as Private and Confidential
- ✓ To receive prompt, courteous, efficient and fair treatment
- ✓ to have their eligibility determined on the basis of objective evidence as required by program policy
- ✓ To receive all assistance and benefits for which they qualify under the policy and procedure established in this manual
- ✓ To be informed of eligibility entitlements in writing if they so request
- ✓ To appeal decisions concerning an application for, or provision of a benefit
- ✓ To be informed of their responsibilities regarding initial and continuing eligibility

RESPONSIBILITIES

ACCESS clients have the following Responsibilities:

- ✓ To disclose any information that is required under the policy and procedures established in this manual
- ✓ To complete all required eligibility forms in a proper manner
- ✓ To take maximum personal responsibility for achieving increased or complete independence
- ✓ To report all resources and income available to the client to support themselves to ACCESS.
- ✓ To inform the Employment Advisor promptly of changes in their circumstances that may affect eligibility

SERVICE LEVEL AGREEMENT GUIDELINES

Minimum Safeguards for Protection of Employment Skills Development Canada's (ESDC's) Personal Information

Client employment records are the property of ACCESS. It is important that they be secured and kept current because they contain confidential information relating to clients, substantiate expenditures of public funds, and are essential to provide advice and other services to clients.

ACCESS staff must ensure the confidentiality of personal records of its clientele by restricting access to such records to authorized:

- ACCESS staff and
- Service Canada Service Delivery Officers (SDO).

Personal information can only be accessed and shared on a "need-to-know" basis.

All ACCESS staff must have or complete the Ministry of Finance: Privacy and Information Sharing: Awareness Training for Contractors and Service Providers.

Clients Files

ACCESS shall establish a file for each individual in receipt of ACCESS services.

The file shall be kept up-to-date, and shall contain relevant employment related documents as follows, and not limited to:

Initial Required Core Forms

- Participant Information Form;(PIF)
- Client Declaration & Release Form;
- LDMA/Employment Insurance Eligibility Form;
- Client Action Plan;
- Assessments
- EAS File Closed Form

Supporting Forms

- School Acceptance Forms (case notes);
- Letter of Agreement/Notification of Sponsorship (or decline);
- Letter of Confirmation Form (where applicable);
- Invoices, receipts, disbursement records and documentation must also be maintained in the file;
- Monthly attendance reports (if applicable);

A completion/final check of file maintenance must be completed and documented before each file is closed

Security Guidelines for Service Canada Files

All client files must adhere to the security guidelines at all times, as outlined below:

DESIGNATED INFORMATION/ ASSETS (Means the unauthorized release could <i>cause injury</i> to an individual, organization or Department)	
Protected "A"	Protected "B"
Injury: Low Loss of privacy/embarrassment, such as: <ul style="list-style-type: none"> • date of birth, • home address, • telephone number, • S.I.N., • etc. Document Standards: Marking: <i>Protected A</i> – on top right corner Storage: Approved security container with approved key lock in operations zone Disposal: Commercial shredder	Injury: Serious Loss of reputation, competitive edge or prejudicial treatment, examples: <ul style="list-style-type: none"> • Criminal/ethnic/religious/political/performance • records, • evaluation, • contractual negotiations, • advice, • adoption papers, • health documents, • Funding application and documents, • etc. Document Standards: Marking: <i>Protected B</i> – on top right corner Storage: Approved security container with approved combination padlock in operations zone Disposal: Approved shredder
Transportation/Mailing Standards for Protected "A" & Protected "B" Within building: One unmarked envelope – transport discreetly by hand or using internal mail service. <u>Mailing Outside Building:</u> Personal Information in the care and control of the Recipient and their Third Parties <i>must</i> be transmitted as letter-mail in a double envelope, gum-sealed, with no security markings on the outer envelope. In instances where delivery is urgent, transportation should be managed by a reliable courier service or similar postal service with a record of transit and delivery, packaged as for communication letter mail. No personal information can be shared outside Canada.	

Public Areas:

All Recipients and their Third Parties publicly accessible areas must be kept clear of Personal Information except when client's files are under the direct care and control of a Recipient and/or their Third Parties. (see all staff's job description)

Facsimile Transmission:

Personal Information can only be faxed between parties using a secure facsimile equipped with the appropriate and compatible security software. (See all staff job description)

E-mail:

Only the minimum necessary information required to deliver services under the ASETS program should be exchanged via email.

Personal Information should only be transmitted electronically by the Recipient and their Third Parties by first inscribing the information in a password protected document and then appending the document to an email. The password for the appended document should then subsequently be shared either by phone or by using a separate email ("password" must not be specified in the subject line) with the authorized party receiving the appended document.

Note: This is not practices but some security measures are being used to ensure that Client information is not in email subject lines

Electronic Storage and Transmission:

Electronic storage and transmission of files and/or databases containing Personal Information in the care and control of the Recipient and their Third Parties may only be authorized where:

- 1) Personal information is encrypted at all times while in transit (i.e. when moving standard data file for clients from one database to another);
- 2) Personal information is protected at all times while in storage; and
- 3) Information technology and Systems involved in managing Personal Information fully comply with policies, procedures and guidelines described in subsection 4.5.1 and 4.5.2 of this Service Level Agreement.

Note: this is not practiced, but ARMS is a secure and SC approved web based application.

Physical Storage:

Storage of physical documents containing Personal Information in the care and control of the Recipient and their Third Parties is permitted:

ACCESS PROGRAM'S POLICY AND PROCEDURES

- 1) Temporarily, on open shelving within areas that are continually monitored (i.e., closed circuit video equipment operating 24 hours a day and 7 days a week) and where access is controlled and limited to authorized personnel of the organization or security staff; and
- 2) Using locked cabinets or secure containers.

Note: the files are kept in each office and in the file storage room. Presently, archived files are being scanned and uploaded into ARMS. Once all archived files are complete. Processes will be created to have all files uploaded when clients initiate services.

Paper Retention and Destruction:

All paper records with Personal Information in the care and control of the Recipient and their Third Parties *must* be retained for a period of six (6) years after completion of the Agreement as per Schedule D section 16 (b) of the Aboriginal Skills and Employment Training Strategy Agreement. Once this six-year period is complete, paper records *must* be destroyed using a commercially available paper shredder producing a cross-cut of 0.8 mm x 12 mm. (see all staff job descriptions)

Nightly Closing:

All employees of Recipient's and their Third Parties must remove all Personal Information from their desks and store it in locked filing cabinets before they leave for the day. They also must remove all documents containing Personal Information from printers and fax machines and place the documents in a locked cabinet. All Recipients and their Third Parties' employees must also log out of all computers and lock the doors and secure the premises (i.e., enabling the alarm system and locking the doors, etc.). (see all staff job descriptions)