


<b>Privacy Policy</b>			
Policy #	ORG-02	Date Created	October 2018
Authority	Board	Date of Last Review	

Country Roads CHC is a health information custodian and therefore subject to the *Personal Health Information Protection Act* of Ontario (PHIPA). That applies to the personal health information of our clients and also to that of our employees when they are clients of our CHC.

In addition, as an employer and a community non-profit agency it collects, uses and discloses personal information of its employees, Board of Directors members, volunteers and contractors. Although no existing provincial or federal privacy statute applies to this personal information, we will comply with the *CSA Model Code for the Protection of Personal Information* (the Model Code) with respect to this personal information. A summary of the Model Code is attached.

The Board is ultimately responsible for compliance with PHIPA and the Model Code. The day to day responsibility for compliance is delegated to the Executive Director. The Executive Director shall:

- Designate a Privacy Officer to ensure compliance with PHIPA and the Model Code
- Ensure Country Roads has an appropriate privacy management plan which includes:
  - Job description for the Privacy Officer
  - Appropriate privacy procedures to address all elements of PHIPA and the Model Code including:
    - Access by individuals to their own personal health information and personal information;
    - Process to correct errors in personal health information and personal information;
    - *Data minimization* and ‘*need to know*’ principles for both personal health information and personal information;

- Procedures for collection, use, disclosure, retention and destruction of personal health information and personal information;
- Breach response protocol, including when notification to either or both the Office of the Information and Privacy Commissioner and/or affected individuals shall occur;
- Transparency to clients and employees of its privacy management program including their right to complain to the Office of the Information and Privacy Commissioner of Ontario if they believe PHIPA has been breached;
- All employees and volunteers shall sign an Oath of Protection of Privacy;
- Orientation training for new hires and regular in-service training for existing employees, volunteers and, where appropriate contractors; and
- Appropriate physical, technological and administrative safeguards to safeguard personal health information and personal information in our custody or under our control.

## **MODEL CODE**

### **Protection of Personal Information**

#### **1. Accountability**

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

#### **2. Identifying Purposes**

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

#### **3. Consent**

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except when inappropriate.

#### **4. Limiting Collection**

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means. .

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

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfilment of those purposes.

## **6. Accuracy**

Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

## **7. Safeguards**

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

## **8. Openness**

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

## **9. Individual Access**

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

## **10. Challenging Compliance**

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.