

PC-02 | CORPORATE PRIVACY POLICY

POLICY DETAILS	
POLICY NAME	Corporate Privacy Policy Statement
POLICY GROUP	Privacy and Confidentiality
POLICY NUMBER/CODE	PC-02
DATE ISSUED	January 2016/March 2018
DATE APPROVED	January 2020
REVIEW DATE	January 2023
RESPONSIBLE STAFF PERSON	Board of Directors
Templates or Forms Associated with these operating practices:	<ul style="list-style-type: none">• Protecting Your Privacy Statement

POLICY

Parkdale Queen West is committed to protecting the privacy and confidentiality of the personal health information in its custody and control. Anyone who collects, uses or discloses personal health information on Parkdale Queen West's behalf is required to follow these 10 information principles. All Parkdale Queen West policies and procedures relating to the collection, retention, disclosure, security and destruction of personal health information are developed in consideration of these ten principles

PRINCIPLE 1 – ACCOUNTABILITY OF PERSONAL HEALTH INFORMATION

Parkdale Queen West is responsible for the personal health information in its custody or control, and has designated an individual, the Executive Director, to act as its privacy contact person. The Executive Director is responsible to oversee and facilitate Parkdale Queen West's compliance with its Privacy Policies and related legislation.

Parkdale Queen West demonstrates its commitment to privacy and the confidentiality of personal health information by:

- Implementing policies and procedures to protect personal health information.
- Educating anyone who collects, uses or discloses personal health information on Parkdale Queen West's behalf about their responsibilities under Parkdale Queen West's policies.
- Implementing policies and procedures through the Executive Director's office to:
 - Receive and respond to complaints
 - Field inquiries on privacy related matters, and



- Make material on Parkdale Queen West's privacy policies and procedures publicly available.

PRINCIPLE 2 – IDENTIFYING PURPOSES FOR WHICH PERSONAL HEALTH INFORMATION IS BEING COLLECTED

Parkdale Queen West will identify to clients from whom it collects personal health information (and explain as necessary) the purposes for the collection.

Parkdale Queen West collects personal health information for purposes related to direct client care, administration and management of Parkdale Queen West programs and services, client billing, statistical reporting, and as permitted or required by law.

When personal health information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified. Unless the new purpose is permitted or required by law, consent is required before the information can be used for that purpose.

PRINCIPLE 3 – CONSENT FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL HEALTH INFORMATION

Parkdale Queen West will generally rely on implied consent from our clients for the collection, use, or disclosure of personal health information. In some circumstances, Parkdale Queen West will obtain express consent to collect, use or disclose personal health information as required by Parkdale Queen West Policy. Parkdale Queen West will collect, use or disclose personal health information as permitted or required by law. Parkdale Queen West may disclose personal health information as required by law without consent.

A client may withdraw consent at any time, but the withdrawal cannot be retroactive.

PRINCIPLE 4 – LIMITING COLLECTION OF PERSONAL HEALTH INFORMATION

Parkdale Queen West limits the amount and type of personal health information it collects to that which is necessary to fulfill the purposes identified. Information is collected directly from the client, unless the law permits or requires collection from third parties

PRINCIPLE 5 – LIMITING USE, DISCLOSURE, AND RETENTION OF PERSONAL HEALTH INFORMATION

Parkdale Queen West uses and discloses personal health information for purposes related to direct client care, administration and management of Parkdale Queen West programs and services, client billing, teaching, statistical reporting and as permitted or required by law.

Further information about uses and disclosure can be found in Parkdale Queen West's Operations Manual.

Personal health information will be retained in accordance with Parkdale Queen West's policy, and as required by law. Otherwise it will be destroyed, erased, or made anonymous. See Client Records Retention, Storage and Destruction Policy.

PRINCIPLE 6 – ACCURACY

Parkdale Queen West will take reasonable steps to ensure that client's personal health information is as accurate, complete and up to date as is necessary for the purposes for which it is used or disclosed. Parkdale Queen West will inform any third parties to whom personal health information is disclosed about any limitations on the information's accuracy.

PRINCIPLE 7 – SAFEGUARDS FOR PERSONAL HEALTH INFORMATION

Parkdale Queen West has implemented security safeguards for the personal health information it holds, which include:

- Physical measures (such as locked filing cabinets);
- Organizational measures (such as permitting access on a "need-to-know" basis only), and
- Technological measures (such as the use of passwords and audits).

Parkdale Queen West requires anyone who collects, uses or discloses personal health information on its behalf to be aware of the importance of maintaining the confidentiality and privacy of personal health information. This is done through the signing of confidentiality agreements, privacy training and contractual means.

Parkdale Queen West has taken steps to ensure that the personal health information in its custody and control is protected against theft, loss and unauthorized use or disclosure. Care is used in the disposal or destruction of personal health information, to prevent unauthorized parties from gaining access to the information.

PRINCIPLE 8 – OPENNESS ABOUT PERSONAL HEALTH INFORMATION POLICIES AND PRACTICES

Information about Parkdale Queen West's policies and practices relating to the management of personal health information are available, including:

- Contact information for the Executive Director, to whom inquires and complaints can be made.
- The process for obtaining access to personal health information held by Parkdale Queen West, and making requests for its correction.

- A description of the type of personal health information held by Parkdale Queen West, including a general account of its uses and disclosures.
- A copy of Parkdale Queen West's Privacy Statement
- Protecting Your Privacy Statement (See Appendix A).

PRINCIPLE 9 – INDIVIDUAL ACCESS TO PERSONAL HEALTH INFORMATION

Parkdale Queen West will give clients timely access to their personal health information and the ability to correct the personal health information in their record if they meet PHIPA's requirements.

PRINCIPLE 10 – CHALLENGING COMPLIANCE WITH PARKDALE QUEEN WEST'S PRIVACY POLICIES AND PRACTICES

Any individual may address a challenge concerning compliance with Parkdale Queen West's Privacy policies and practices to the Privacy Officer or designate at (416) 703.8482

Parkdale Queen West will receive and respond to inquiries and complaints about its policies and practices relating to the handling of personal health information. It will inform individuals who make inquiries or make complaints of other available resources i.e. the Information and Privacy Commission for the province of Ontario.