

COMMUNITY LIVING TIMMINS INTEGRATION COMMUNAUTAIRE

POLICY MANUAL: Programs

POLICY #: CIMS-2

SECTION: Client Information Management System

SUBJECT: Privacy Policy

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Date Approved: April 11, 2007	Executive Director:
Date Reviewed:	
Date Revised: June 1, 2011	Date:

POLICY:

At Community Living Timmins Intégration Communautaire, the privacy of your personal information has always been an important aspect of how we operate. As such, Community Living Timmins Intégration Communautaire has developed the following Privacy Policy in order to ensure compliance with privacy legislation, as well as to inform individuals of our continuing commitment to the protection of their personal information.

DEFINITIONS:

Any reference to “*the information*”: means your Personal Health Information as defined by PHIPA.

What is personal information?

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form such as a personal e-mail address, credit card numbers, home addresses and so on. It does not include information normally found on a business card, such as name, title, company, business address, business e-mail address, business telephone or fax number.

Who is responsible for protecting the personal information collected, used and disclosed by Community Living Timmins Intégration Communautaire?

The Executive Director of Community Living Timmins Intégration Communautaire has a designated Privacy Officer for the organization. All employees and members of the Board are responsible for ensuring compliance with this Privacy Policy. At times, Community Living Timmins Intégration Communautaire staff may be delegated to act on behalf of the Privacy Officer or to take responsibility for occasional collection, use and disclosure of personal information.

Getting Consent

The consent to the collection, use or disclosure of the information may be implied or expressed.

1. **Expressed (written) consent** will always be asked in the following circumstances:
 - For all collection, use or disclosures of information (see Authorization for Assessment and Follow up Form)
 - Where the disclosing of the information is to someone who is not a Health Information Custodian (i.e. to an insurer, an employer, WSIB, CAS, lawyer, etc.); and
 - Where the disclosing of the information is to someone who is a Health Information Custodian but for the purposes other than providing health care (e.g. a school nurse)
 - To promote activities and/or services offered by CLTIC and for use for material (consent form attached)

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2. **Implied consent** is one that is obtained where one is provided with a notice (either posted in a place where one is likely to see it, directly given to you verbally) and an opportunity to withhold consent is given.
 - Limitations and withdrawal of consent may be provided at any time, unless doing so prevents service providers from recording the information that is required by law or under professional standards. Expressed (written) instruction can be given to specify what information should not be used or disclosed.
3. Personal information can sometimes be collected, used or disclosed without consent in limited instances that are expressly permitted by PHIPA. For example, some statutes require disclosure of personal information, such as the Coroners Act, the Vital Statistics Act and the Child and Family Services Act.
4. CLTIC will review annually its G-2 and CIMS-2 policy and consent to collection, use or disclosure of personal information with persons who receive services and supports from the agency and shall do so in a language and manner, and with a level of support, that is appropriate to the capacity of the person supported and with any person acting on their behalf.
5. The agency shall train staff members, students and volunteers and provide orientation to new staff members and its Board of Directors regarding its policies and procedures, respecting privacy and confidentiality and consent to collection, use or disclosure of personal information.

Why does Community Living Timmins Intégration Communautaire collect, use or disclose personal information?

Community Living Timmins Intégration Communautaire is committed to providing its clients with the best possible intervention to ensure achievement of their maximum potential. Community Living Timmins Intégration Communautaire may collect, use and disclose personal information, when applicable, for the following purposes:

- As a basis to plan client care and intervention
- As a communication tool between intervention staff
- Legal documentation regarding client care
- As a source of data for clinical research and statistics
- As a planning tool to facilitate changes
- For fundraising activities
- To comply with legal and regulatory requirements

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How can individuals access their personal information held by Community Living Timmins Intégration Communautaire?

Clients have a right to access their own personal information in the possession and control of Community Living Timmins Intégration Communautaire. Clients are able to request a restriction on certain uses and disclosures of their information, amend their health records, obtain an account of disclosures of their health information, or revoke authorization to use or disclose their health information except to the extent that action has already been taken. (subject to legal exceptions)

How much personal information does Community Living Timmins Intégration Communautaire collect, use or disclose?

Community Living Timmins Intégration Communautaire collects, uses and discloses personal information only to the extent required to fulfill the purposes stated within this policy.

How long does Community Living Timmins Intégration Communautaire retain personal information?

Community Living Timmins Intégration Communautaire retains personal information only for as long as is required to fulfill the purposes stated in this policy, and to meet all requirements by law.

How accurate is the personal information collected, used and disclosed by Community Living Timmins Intégration Communautaire?

It is the responsibility of the client and/or caregiver to advise Community Living Timmins Intégration Communautaire of changes to their personal information.

Clients and/or caregiver should notify the appropriate Community Living Timmins Intégration Communautaire service provider of any changes to their personal information.

How secure is the personal information stored at Community Living Timmins Intégration Communautaire?

Community Living Timmins Intégration Communautaire is committed to ensuring that personal information is protected from unauthorized access, unintended disclosure or theft. This protection is provided by firewalls in the computer system, passwords to protect databases, signed confidentiality agreements, locking file cabinets and restricted access to offices. Only authorized personnel have access to this information.

How is personal information collected, used or disclosed via Community Living Timmins Intégration Communautaire web site?

The Community Living Timmins Intégration Communautaire website may log internet protocol addresses of visitors. This information is used, in aggregate form, to provide statistical measures about usage of the site. This in turn allows us to continually improve the content and design of our web sites.

Community Living Timmins Intégration Communautaire website does contain links to other websites owned and operated by third parties. While we attempt to ensure that these organizations adhere to similar privacy policies, we are not responsible for the content or privacy practices of such sites. It is

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highly recommended that you review the privacy policies of other sites prior to providing any personal information on those sites.

How can individuals relay their concerns about their personal information held by Community Living Timmins Intégration Communautaire?

If individuals have a complaint related to the Community Living Timmins Intégration Communautaire Privacy Policy, they may contact the Privacy Officer in writing. If the Privacy Officer is unable to resolve the concern, or if there are further complaints, individuals may contact the Privacy Commissioner of Ontario.

Reference: *Personal Health Information Protection Act, November 2004 (PHIPA).*

Revised: Volunteer Package