

 Rainy River District Social Services Administration Board	SECTION: Human Resources
	POLICY TITLE: Privacy of Information
ORIGINAL DATE: December 16, 2004	POLICY AREA: Privacy/Access
REVISION DATE: December 17, 2015	POLICY NO: HR-6.0
NEXT REVIEW DATE: December, 2019	APPROVED BY: Board Res. #100/15

Purpose

The Rainy River District Social Services Administration Board (RRDSSAB) is vitally interested in protecting the privacy of personal information. The Board is committed to collecting, using and disclosing information responsibly and only to the extent necessary for the services we provide. The RRDSSAB endeavours to be open and transparent as to how they handle personal information.

Policy

The RRDSSAB makes every reasonable effort to ensure that personal information is protected and confidentiality maintained, in compliance with relevant legislation, including but not limited to:

- the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*;
- *Freedom of Information and Protection of Privacy Act (FIPPA)*;
- *Personal Health Information Protection Act (PHIPA)*;
- *Housing Services Act; Ontario Works Act,*
- *Ambulance Act and Regulations;*
- *Ontario Disability Support Program Act;*
- *Child Care and Early Years Act, 2014;*
- *Ministry of Community & Social Services (MCSS) Child Care Management Guidelines;*
- *Workplace Safety and Insurance Act (WSIA); and*
- *RRDSSAB policies, as amended.*

Definitions

“Privacy” encompasses the rights and obligations of individuals and organizations with respect to the collection, use, disclosure and retention of personal information. The collection and storage of personal information should be treated in a manner that is respectful of the individual. Privacy is not the same as security, although safeguarding personal information is an important aspect of privacy.

“Personal Information” is information about an identifiable individual, but does *not* include the name, title or business address, business telephone/fax number, or business email address of an employee of an organization. For the application of this policy,

personal information includes:

- a) the personal address, telephone number or email address of the individual;
- b) any identifying number assigned to an individual which can lead to their identification (e.g. Social Insurance Number);
- c) information about an individual's income and assets;
- d) bank account and credit card information;
- e) information about rent payment history;
- f) information relating to the race, national or ethnic origin, citizenship status, colour, religion, age, sex, sexual orientation, marital or family status of the individual;
- g) information relating to the education, medical, psychiatric, psychological, criminal or employment history of the individual;
- h) credit and rental history reports;
- i) financial information for the purposes of establishing eligibility for Program assistance;
- j) an individual's blood type or fingerprints;
- k) information about an individual's personal or political opinions;
- l) correspondence sent to the RRDSSAB that is of a private or confidential nature, and any replies from the RRDSSAB that would reveal contents of the original correspondence;
- m) the individual's name if it appears with other confidential information (e.g. *Rental Arrears Reports*, garnishee, etc.); and
- n) employee information including résumés, salary and benefits, disciplinary action, bank account information, client/tenant complaints about an individual, and problems between staff.

Personal information does *not* include statistical data, which is summarized in such a way as to not identify any individuals. Business contact information and certain publicly-available information such as name, address and telephone number (as published in telephone directories) are *not* considered personal information.

"Private Health Information" the application of this policy, private health information includes information relating to:

- a) an individual's physical or mental health;
- b) the provision of private health care, including identifying a provider of health care;
- c) a plan of service within the meaning of the *Long-Term Care Act*;
- d) the donation of a body part or bodily substance;
- e) payment or eligibility for health care in respect of the individual;
- f) a health card number;
- g) identification of a substitute decision-maker of the individual; and/or
- h) a record that contains any of the above information.

Private health information does *not* include a record of information about an employee of an organization, unless the record is primarily related to the provision of private health care to the employee.

Procedures

Collection of Information

1. The RRDSSAB collects personal information or private health information for the following purposes only:
 - a) to approve an application for one of RRDSSAB's services;
 - b) to determine income and assets for income/needs testing;
 - c) to demonstrate compliance with funding requirements;
 - d) to protect the private health and safety of the client, and provision of care, as required;
 - e) to complete all required patient and administrative documentation as specified in the *Ambulance Act* and local policies and procedures, including *Ambulance Call Reports (ACRs)*;
 - f) provision of emergency medical care while ensuring the safe and timely land transportation of ill or injured persons to, from and in between medical treatment facilities;
 - g) to ascertain service levels required in program areas;
 - h) to conduct reference and employment checks; and
 - i) to retain relevant information on employees for government-reporting purposes.
2. Staff must not seek out personal information about clients or applicants, unless it is relevant to their duties. All documents used for collection of personal information will state:
 - a) the purpose or purposes of the collection;
 - b) the reasons for collection, including the fact that the information may be shared as necessary for the purpose of making decisions or verifying eligibility for assistance under the *Housing Services Act*; the *Ontario Disability Support Program Act*; the *Ontario Works Act*; or the *Child Care and Early Years Act, 2014*; or as authorized by an agreement under the *Housing Services Act*; *Private Health Discipline Act*; *Ambulance Act*, and other relevant legislation; and
 - c) the name, title, business address and business telephone number of the Privacy Officer who can answer questions and respond to complaints about the collection, use or disclosure of the specific information.
3. A *Consent Form* must be signed by the applicant or client authorizing the collection, use, verification or disclosure of the information being collected.
4. It is not necessary to have a signed consent to release information to collect a debt, for example, for a Tribunal, Small Claims and/or litigated action.

5. Requests to correct and/or access personal and private health information are handled by the Privacy Officer, per policy.

Protection and Security of Information

1. The RRDSSAB protects information in the following ways:
 - a) All staff and Board members are required to sign an Oath of Confidentiality form.
 - b) Applicant, client, tenant and employee files (including information on databases) are safeguarded against unauthorized access.
 - c) Applicant, client, tenant, and employee information is stored in a locked filing cabinet. Secure storage facilities are provided for archived applicant/tenant/employee and accounting information.
 - d) Staff and members of the Board, where appropriate, have access to records containing personal information, only if required in order to fulfil their duties.
 - e) When communicating client/tenant issues to the Board, staff use non-identifying information as much as possible. For example, reports should use codes in place of the actual names of clients or tenants.
 - f) Electronic documents and databases containing confidential files with personal information, are password-protected or encrypted against unauthorized access.
 - g) Screen-savers or other protective action are used to protect confidentiality of personal information on computer monitors.
 - h) Telephones equipped with voice mail are password-protected against unauthorized access.
 - i) All staff has a responsibility to ensure that unauthorized individuals do not have unsupervised access to areas where files are kept and used.
 - j) Personal information is disposed, as defined under relevant legislation, with documentation of disposal retained by the appropriate Manager, per RRDSSAB policy.
 - k) Paper-based personal information must be shredded, prior to disposal.
 - l) Computers and electronic equipment are purged, prior to disposal.