



<b>Standards: Governance</b>	<b>HPCO Standard: A1.1 I</b>	<b>Policy: Governance A1.1 I</b>
<b>Original Approval Date: July 31, 2017</b>	<b>Date Revised: August 2017</b>	<b>Revision Approval Date:</b>

## *PRIVACY AND CONFIDENTIALITY POLICY*

### **POLICY STATEMENT:**

NNPCN acknowledges the requirement to comply with the terms and conditions of the Personal Health Information Protection Act (PHIPA) and the Personal Information Protection and Electronic Documents Act (PIPEDA).

NNPCN is committed to the principles set out in PHIPA and PIPEDA, which requires that Personal Health Information (PHI) and other personal information (ie: donor status) is protected.

Information will be collected, stored, used and shared responsibly and securely. We will only collect information that is necessary and sharing information will be the individuals responsible for providing care and other staff, students and volunteers, for the purposes directly related to their duties.

NNPCN collects, uses, shares and retains personal health information for the following purposes:

- To provide quality service
- To deliver safe and efficient client care
- To communicate with and make referrals to other care providers
- To comply with legal and regulatory requirements
- Research, teaching and statistics

### **PURPOSE:**

To protect the privacy and right of confidentiality of all clients, families, caregivers, staff, volunteers, students, partners, and donors involved with services provided by the NNPCN.

## **PROCEDURE:**

All staff, volunteers, students and board members shall keep confidential and private any and all information they acquire during the course of their tenure, and after leaving the NNPCN.

This includes, but is not limited to:

- Personal information concerning clients and families
- Personal information concerning all members of the Board, volunteers and staff
- Confidential information obtained from third parties
- Confidential information concerning the business of operations of the NNPCN

Subject to legislation and regulations, any personal or confidential information shall be released only as required in the necessary course of employment or volunteerism and only by those persons authorized to release such information. Information covered by this policy shall include information that is written or unwritten or stored electronically.

Any suspected breach of confidentiality will be recorded as an incident, investigated by the Executive Director, and brought to the attention of the Board Chair. If proven legitimate, it will lead to immediate disciplinary action or the possible dismissal of the staff or volunteer involved in the breach.

The following 10 privacy principles will be followed:

### **1. Accountability:**

- NNPCN is responsible for keeping personal information, including personal health information secure, accurate, and up to date.
- The Executive Director is accountable for compliance with these principles.
- Privacy complaints and inquiries can be made to NNPCN via 705-497-9239 or via email to [ed@nnpcn.com](mailto:ed@nnpcn.com)
- All NNPCN team members receive privacy training during their orientations and privacy refresher sessions provided annually.

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

- NNPCN will identify the purposes for which information is collected at or before the time the information is collected.
- NNPCN will only collect information necessary for the provision of care, services and programs
- Persons collecting personal information must be able to explain to individuals the purpose for which the information is being collected.

### **3. Consent to Collecting, Use and Disclosure of Personal Information:**

- Knowledgeable consent of the individual is obtained for the collection, use of disclosure of personal information
- This principle requires “knowledge and consent.” NNPCN will make a reasonable effort to ensure that the individual (or Substitute Decision Maker- SDM) is advised of the purposes for which the information is to be used. To make the consent meaningful, the purposes must be stated in such a manner that the individual can reasonably understand how the information will be used or disclosed.
- Individuals can consent by:
  - Completing and signing a consent form
  - Consent may be given orally when information is collected over the telephone or
  - Consent may be given at the time that individuals receive services.
- Consent may be withdrawn at any time by contacting the NNPCN.

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

- NNPCN will limit the collection of personal information to that which is necessary for the purposes identified. Information will be collected by fair and lawful means.

### **5. Limiting Use, Disclosure and Retention of Personal Information:**

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

### **6. Accuracy:**

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

### **7. Safeguards:**

- Personal information is protected by security safeguards, electronic and/or physical, as appropriate to the sensitivity of the information.
- The security safeguards protect personal information against loss of theft, as well as unauthorized access.
- Methods of protections include:
  - Physical measures- ie: locked filing cabinets and restricted access to offices;
  - Organizational measures – ie: confidentiality agreements and limiting access on a need-to-know basis; and
  - Technology measures – ie: use of passwords and access controls.
- NNPCN ensures all team members are aware of the importance of maintaining the confidentiality of personal information. All staff, students and volunteers have a signed confidentiality agreement and have received training on the policies and procedures to protect personal information.
- Care is used in the disposal or destruction of personal information, to prevent unauthorized parties from gaining access to the information.

#### **8. Openness:**

- NNPCN will make readily available to individuals, specific information about its policies and practices relating to the management of personal information that support our commitment to privacy.
- Individuals are able to acquire information about policies and practices without unreasonable effort.

#### **9. Individual Access:**

- Upon request, an individual is informed of the existence, use and the disclosure of his or her personal information and is given access to that information.

#### **10. Challenging Compliance:**

- An individual is able to address a challenge concerning compliance with the above principles directly with the Executive Director by contacting the office at 705-497-9239 or by email to [ed@nncpn.com](mailto:ed@nncpn.com).
- The NNPCN will respond to such enquiries in an accurate and timely manner.
- The NNPCN will investigate all complaints. If a complaint is found to be justified, NNPCN will take appropriate measures, including, if necessary, amending its policies and procedures.
- All staff, volunteers and students will follow the Privacy Policy and maintain confidentiality as related to PHIPA and PIPEDA. Violations of this policy may result in disciplinary action, up to and including termination.

**REVISION HISTORY:**

DATE mm/dd/yyyy	REVISED BY	REVIEW ONLY (✓)	COMMENTS / MODIFICATIONS	BOARD APPROVAL DATE: mm/dd/yyyy