

County Roads Community Health Centre

Privacy Policy (**Revised Oct.25, 2018**)

Country Roads CHC is a health information custodian and therefore subject to the *Personal Health Information Protection Act* of Ontario (PHIPA). **This legislation** 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, **the CRCHC** 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;
- **A requirement that 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.

Policy: Privacy GOV _____

Developed on: August 2018

Reviewed on:

Approved on: