



## 3.18 Privacy

### **Policy Statement:**

Hospice West Parry Sound (HWPS) 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).

HWPS is committed to the principles set out in PHIPA and PIPEDA, which requires that Personal Health Information (PHI) and other personal information (i.e. 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 of this information will be with individuals responsible for providing care and with other staff, students, and volunteers, for the purposes directly related to their duties.

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

- To provide quality services;
- To deliver safe and efficient client care;
- To communicate with and make referrals to other care providers (circle of care);
- To comply with legal and regulatory requirement;
- Research, teaching, and statistics.

This policy applies to all HWPS staff, volunteers, students and board members.

### **Documentation:**

Confidentiality Agreement

### **Purpose:**

To protect the privacy of all clients, caregivers, staff, volunteers, and donors within all considered reasonable measures.

### **Procedure:**

The following 10 privacy principles are followed:

#### ***Principle 1 – Accountability:***

- HWPS is responsible for keeping personal health information secure, accurate, and up to date.



- The Executive Director (ED) is accountable for compliance with these principles.
- Privacy complaints and inquiries can be made to the Hospice Office at: 705-746-4540 ext. 1416 or via email at: hospice@wpsbc.com.
- All HWPS team members receive privacy training during their orientation and privacy refresher sessions are provided yearly.

***Principle 2 – Identifying Purposes:***

- HWPS will identify the purposes for which information is collected at or before the time the information is collected.
- HWPS 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 purposes for which the information is being collected.

***Principle 3 – Consent for Collection, Use and Disclosure of Personal Information:***

- Knowledgeable consent of the individual is obtained for the collection, use or disclosure of personal information.
- This principle requires “knowledge and consent”. HWPS will make a reasonable effort to ensure that the individual (or SDM where appropriate) is advised of the purposes for which the information will 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 in many ways:
  - 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
- An individual (or SDM where appropriate) may withdraw consent at any time by contacting the Hospice office.

***Principle 4 – Limiting Collection:***

- HWPS 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.

***Principle 5 – Limiting Use, Disclosure and Retention of Personal Information:***

- Personal information is not 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 for the fulfillment of those purposes.



***Principle 6 – Accuracy:***

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

***Principle 7 – Safeguards:***

- Personal information is protected by security safeguards, which include electronic and physical, appropriate to the sensitivity of the information.
- The security safeguards protect personal information against loss or theft, as well as unauthorized access.
- The methods of protection include:
  - Physical measures, e.g. locked filing cabinets and restricted access to offices;
  - Organizational measures, e.g. confidentiality agreements and limiting access on a “need-to-know” basis; and
  - Technology measures e.g. use of passwords and access controls
- HWPS ensure all team members are aware of the importance of maintaining the confidentiality of personal information. All staff, student 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.

***Principle 8 – Openness:***

- HWPS 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. Please contact the Hospice office for more information.

***Principle 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.

***Principle 10 – Challenging Compliance:***

- An individual is able to address a challenge concerning compliance with the above principles to the Executive Director by contacting the Hospice office at: 705-756-4540 ext. 1416.
- HWPS responds to such enquiries in an accurate and timely manner.



- HWPS will investigate all complaints. If a complaint is found to be justified, HWPS will take appropriate measures, including, if necessary, amending its policies and procedures.
- All staff, volunteers and students will follow the Privacy Policy and maintaining confidentiality as related to PHIPA and PIPEDA. Violations of this policy may result in disciplinary action, up to and including termination.

Board Approval Date: May 2003

REVISED: May 15, 2008; July 22, 2009; January 24, 2017