Confidentiality

Legislative References: Information and Privacy Commissioner/Ontario Fact Sheet, Number 12, May, 2007 PHIPA

Purpose:

As the health information custodian, HHC will take every reasonable step to secure the personal and health information of the facility's clients and staff against theft, loss, and unauthorized use or disclosure, as well as, protecting this information against unauthorized copying, modification and disposal. In addition, the custodian will ensure practices are in place at all of its facilities to ensure all types of personal health information (as per PHIPA definition) are retained, transferred or disposed of in a secure manner.

Policy Statements:

HHC, upon request, will communicate the organization's purposes for the collection, use or disclosure of personal health information. This may be communicated verbally; however, a written statement will exist that describes the:
- Custodian's information practices;
- Contact information of the custodian, and/or personal health information contact person(s);
- Procedure to explain how an individual may obtain access to, or request correction of, a record; and
- Procedure to make a complaint to the custodian and the Commissioner.

Procedure:

In the event personal health information of an individual is used or disclosed in a manner that is deemed a privacy breach, the custodian must inform the individual, make a note regarding the action, and keep the note as part of the records or in a form linked to the corresponding record.

The custodian can designate an agent to act on the custodian(s)' behalf; however, the agent must perform only the permitted duties.
In the event of a written request to correct an individual's record of personal health information that is deemed inaccurate or not complete, the custodian will be obligated to correct it unless the custodian did not create the record or if such revision would be inconsistent with a professional opinion made in good faith.

The health information custodian will designate a contact person or assume the position of the individual who is authorized to:
- Assist the custodian to comply with the Act;
- Ensure that all agents are informed of their duties under the Act;
- Respond to inquiries about the custodian(s)' information practices;
- Respond to requests for access or correction of records; and
- Receive complaints regarding contraventions of the Act.

If personal health information is in any way breached, the Executive Director will inform the individual of this occurrence.