

 <p style="text-align: center;">OPERATIONAL POLICY</p>	<p style="text-align: center;">PRIVACY</p> <p>Approved: February 2018 Review and Approval: January 2019</p>
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Commitment to Privacy and Policy Statement

Hospice Wellington recognizes the importance of privacy of personal information for all stakeholders of the organization.* The Volunteers and Staff at Hospice Wellington are bound by law and ethics to safeguard the privacy and the confidentiality of ALL personal information.

Hospice Wellington is responsible for the personal information that is collected, used, maintained and disclosed for any reason in compliance with all regulatory legislation, including:
Freedom of Information and Protection of Privacy Act, R.S.O. 1990 (FIPPA)
Personal Health Information Protection Act, 2004, S.O. 2004 (PHIPA)
Personal Information Protection and Electronic Documents Act, S.C. 2000 (PIPEDA)
Quality of Care Information Protection Act, 2004, S.O. 2004

This Privacy Policy governs the collection, use, disclosure, retention and destruction of all personal information. This information will not be used or disclosed for purposes other than that for which it was collected, except by written consent.

Hospice Wellington strives to provide clients with excellent medical care and service, as well as provide all stakeholders with the assurance that personal information obtained is protected in compliance with the law.

Every member of Hospice Wellington must abide by our commitment to privacy in the handling of personal information. To ensure this accountability, Hospice Wellington ensure training for all staff concerning all Privacy policies and procedures.

*Stakeholders include, but are not limited to:

Volunteers, Donors, Clients, Family Clients, Staff, Funders, Community Partners, Physicians and Health Care Networks and Partners, Members of the Organization, Vendors and Supplies, and the Community.

Accountability

We take our commitment to securing privacy for clients, and all stakeholders of the organization for which we obtain and retain personal information, very seriously, and strive to maintain full compliance with Federal and Provincial legislation regulating Privacy. Each employee associated with the Hospice Wellington is responsible for the personal information under his/her control. Our employees are informed about the importance of privacy and receive information

periodically to update them about our Privacy Policy and related issues.

Identifying Purposes: Why We Collect Information

Hospice Wellington requests information to establish a relationship and provide service to our community in programming, client care, charitable giving, and stakeholder partnerships. We obtain most of that information directly from stakeholders, or, in the case of personal health information, from other health practitioners authorized to disclose to us. All stakeholders are entitled to know how personal information is used by our organization and this is described in the Privacy Statement posted at Hospice Wellington. Hospice Wellington will limit the information collected to the purpose for collection and use it only for those purposes. Hospice Wellington will obtain appropriate consent if the information is to be used for any other purpose.

Limiting Collection

Hospice Wellington collects information by fair and lawful means and collect only that information which may be necessary for purposes related to the provision of services.

Collection, Use, Disclosure and Retention

The information Hospice Wellington requests from stakeholders is used for the purposes defined. Hospice Wellington will seek consent before using the information for purposes beyond the scope of the posted Privacy Statement.

Hospice Wellington generally collects the following personal information:

- Personal Identification and Contact information (such as, but not limited to; name, address, date of birth; email; emergency contact);
- Financial information in the case of charitable giving and donations (such as, but not limited to; name, address, phone, email, banking or credit card information);
- Employment information, only as allowed by Employment Standards Act

Under no circumstances does Hospice Wellington sell client lists or other personal information to third parties. There are some types of disclosure of personal health information (PHI) that may occur as part of Hospice Wellington fulfilling its routine obligations and/or organizational management. This includes consultants and suppliers to the Organization, on the understanding that they abide by this Privacy Policy, and only to the extent necessary to allow them to provide business services or support to Hospice Wellington.

Hospice Wellington will retain your information only for the time it is required for the purposes described. Once personal information is no longer required, it will be destroyed. However, due to on-going exposure to potential claims, some information is kept for a longer period, in compliance with legislative compliance.

Clients may be required to sign and date a Consent to Disclose Personal Health Information Form prior to release of information.

Personal Health Information

The appropriate collection, use and disclosure of all personal health information is fundamental to our day-to-day operations and to client care. Protecting the privacy and the confidentiality of clients' personal health information is important to the physicians and staff at Hospice Wellington. Personal health information includes:

- Consent for Hospice Admission
- Specific Consent for Collection and Release of Medical Information necessary for Admission and provision of care
- Identifying information about an individual relating to their physical or mental health (including medical history)
- Providing of health care to the individual
- Payments or eligibility for health care
- Organ and tissue donation
- Ontario Provincial OHIP number.

Hospice Wellington maintains a Privacy Code system for each Resident upon admission, which ensures private health care information is secured. This code is provided to client and Power of Attorney upon time of admission. Telephone inquiries providing this code indicate permission to staff to provide information with respect to room location or health status of that client.

Consent

All individuals have the right to determine how personal information is used and disclosed. In the case of personal health care information, consent is implied as a result of consent to treatment, however, in all circumstances express consent must be written. Written consent will be documented in client's medical records with appropriate notification to health care providers.

Clients who have withdrawn consent to disclose Personal Health Information (PHI) must sign and date the Consent to Withdrawal Form. It is understood that the consent directive applies only to the PHI which the client has already provided, and not to PHI which the client might provide in the future: PHIPA permits certain collections, uses, and disclosures of the PHI, despite the consent directive; healthcare providers may override the consent directive in certain circumstances, such as emergencies; and the consent directive may result in delays in receiving health care, reduced quality of care due to healthcare provider's lacking complete information about the client, and healthcare provider's refusal to offer non-emergency care. The written Consent to Withdrawal Form will be forwarded to the Privacy Officer who will document the request in client's medical records and notify appropriate health care providers.

Accuracy

Hospice Wellington endeavours to ensure that all decisions involving personal information are based upon accurate and timely information. While we will do our best to base decisions on accurate information, the onus remains with the stakeholder to disclose all material information and to inform of any relevant changes.

Safeguards: Protecting Your Information

Hospice Wellington protects information with appropriate safeguards and security measures, including, but not limited to, the following steps:

- Hospice Wellington maintains information in a combination of paper and electronic files. Paper records concerning individuals' personal information are stored in files kept onsite at our offices located at 795 Scottsdale Drive, Guelph, and are secured in a locked and restricted area. Personal information in files archived are transported and retained in secure off-site storage facility, as per vendor agreement. Archived files and personal information are accessible at all times.
- As per recommended compliance standards, Personal Health Information records are retained for a limit of 10 years, and then disposed of through secure method; financial information for the organization is retained for a limit of 7 years, and then disposed of through secure method.
- Access to personal information will be authorized only for the employees associated with Hospice Wellington, and other agents who require access in the performance of their duties, and to those otherwise authorized by law.
- Hospice Wellington provides information to health care providers acting on behalf of a client, on the understanding that these agents are also bound by law and ethics to safeguard privacy. Other organizations and agents must agree to abide by our Privacy Policy and may be asked to sign contracts to that effect. Hospice Wellington will provide only the information necessary to perform the services for which they are engaged, and will require that no storage, use or disclosure of that information take place for purposes other than to carry out those services.
- Computer systems and security policies, protocols and procedures at Hospice Wellington are maintained at a very high level of compliance and risk management, are password-secured and protected from access from anyone other than authorized individuals. Ongoing and constant maintenance and risk assessment and mitigation strategies with respect to, but not limited to Virus, Malware, Ransomware, Data breach, etc., is in place for all electronic data and database information, as per legislative compliance.
- Electronic information is transmitted through direct line, anonymized or encrypted

E-mail sent to Hospice Wellington that includes personal information, such as name included in the "address", will be used to respond to your inquiry. Stakeholders are cautioned that e-mail is not necessarily secure against interception. If communication is of a sensitive nature, please provide by encrypted e-mail or document whenever possible.

Retention and Destruction of Personal Information

Hospice Wellington retains personal information as per our policy, guided by requirements related to law and legislative regulations.

Paper records are destroyed by secured shredding process in locked boxes and third party shredding company disposal. Shredding policy mandates shredding of "all paper" throughout the organization. Paper records are disposed of through shredding method at appropriate time of disposal, and as per compliance with legislation, as under the supervision of the Privacy Officer.

Electronic information is destroyed by deletion from server, virtual storage and from computer hard drive by IT technician and under the supervision of the Privacy Officer. When computer hardware is discarded, each hard drive is physically destroyed.

Access and Correction

With limited exceptions, Hospice Wellington will provide access to personal information retained by our organization within a reasonable time, upon presentation of a written request and satisfactory identification. Any cost incurred will be provided in writing.

If errors of fact are present within personal health information, please notify Hospice Wellington as soon as possible to ensure the appropriate corrections. Hospice Wellington is not required to correct information relating to clinical observations or opinions made in good faith. A client therefore has a right to append a short statement of disagreement to a record if our organization refuses to make a requested change.

If your request for access to your personal information is denied for any reason, Hospice Wellington will advise in writing of the reason for the refusal, providing a process to challenge that decision.

Openness: Keeping You Informed

Hospice Wellington has prepared this plain-language Privacy Policy to keep our stakeholders informed. If there are any additional questions or concerns concerning this policy, please contact the Privacy Officer, at the contact provided below.

10. Complaint Process

All stakeholders are encouraged to contact Hospice Wellington with any questions or concerns regarding this Privacy Policy. Hospice Wellington will investigate and respond to all concerns and regarding any aspect of the treatment of personal information.

Please direct your concerns to the *Pat Stuart, Executive Director and Privacy Officer for Hospice Wellington*, who can be reached at:

Hospice Wellington

795 Scottsdale Drive, Guelph, Ontario, N1G 3R8

Phone: 519-836-3921 ext 225

pat.stuart@hospicewellington.org

If, after contacting Hospice Wellington, concerns have not been addressed satisfactorily, all stakeholders are entitled to submit a complaint to:

The Information and Privacy Commissioner/Ontario. The Commissioner can be reached at:

2 Bloor Street East, Suite 1400

Toronto, Ontario M4W 1A8

1-800-387-0073

1-416-325-9195 (fax) www.ipc.on.ca