



## Privacy Policy

### PREAMBLE

This policy reflects CMHA Peel Dufferin's compliance with fair information practices, applicable laws and standards of practice. In the course of delivering its services and programs, CMHA Peel Dufferin (hereinafter known as "the agency") collects, uses and discloses personal health information from its client. The agency is committed to protecting the confidentiality of the clients' personal health information and the privacy of the clients while facilitating the effective provision of the services and programs.

The purpose of this privacy policy is to describe the way in which the agency supports a client's right to privacy and confidentiality, as outlined in the Personal Health Information Protection Act (PHIPA) 2014.

### POLICY

Protecting the privacy and the confidentiality of client's personal health information (PHI) is important to the agency. The agency establishes rules for the collection, use and disclosure of the client's personal health information that protects the confidentiality of that information. The agency will in good faith ensure that all personal health information will be maintained private, confidential and secure under its control. The agency and its staff are accountable for maintaining confidentiality and privacy of all information collected, used or disclosed during and after their employment or professional contact.

#### 1. Accountability:

The agency establishes an effective privacy program to support the client's right to privacy and ensures compliance with privacy legislation and regulations. The privacy officer is appointed to manage the privacy program and oversee the compliance to the policy and related procedures.

#### 2. Identifying Purposes:

The purposes for the collection, use and disclosure of Personal health information include but are not limited to:

- Providing quality healthcare programs and services to clients.
- Contacting clients about our fundraising and membership activities.
- Providing information when necessary and required to those that are within the Circle of Care for delivery of services.
- Conducting research to understand the kinds of issues our clients are facing.
- Reviewing client files to ensure high quality of service and documentation.
- Evaluating the agency's programs and services.
- Meeting legal and regulatory requirements.

### **3. Consent:**

The client is required to understand how personal health information is collected and knowledgeable consent of the client is required for the collection, use or disclosure of personal health information. The agency will make reasonable efforts to inform its clients in understanding how the agency collects, uses and discloses personal health information. The agency will rely upon implied consent for the collection, use and disclosure of personal health information for the provision of health care services. Expressed consent will be obtained for any purposes that extend beyond health care services.

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

The agency will limit the amount and the type of personal health information collected to that which is relevant to provide service. All information will be collected by fair, lawful and indiscriminate means.

### **5. Limiting Use, Disclosure and Retention:**

Personal health information will not be used or disclosed for purposes other than those for which it was collected, except with the consent from the client or as required by law. Personal health information will be retained only for as long as is necessary for the fulfilment of those purposes or as required by law (i.e. legal requirements with respect to retention periods of personal health information).

### **6. Accuracy:**

The agency will take reasonable steps to ensure that personal health information is as accurate, complete and relevant as possible and is necessary for the purpose(s) for which it is intended.

### **7. Safeguards – Protecting Patient Information:**

The agency has appropriate security controls and safeguards in place to protect personal health information against loss, theft, unauthorized access, disclosure, copying, use, or modification regardless of the format in which it is held. Care will be used in the disposal or destruction of personal health information, to prevent unauthorized persons gaining access to the information.

## 8. Openness:

The agency will make available to its clients, information regarding its privacy practices relating to the management of personal health information in a format that is generally understandable.

## 9. Access and Correction:

The client will be given access their personal health information collected by the agency. Upon written request, a client will be informed of the existence, use and disclosure of personal health information and will be provided access to that information, unless the staff and/or the privacy officer deems that access to that information could be harmful to the client or a third party.

The client has the right to challenge the accuracy and completeness of the information and request to correct it. The staff will correct the information as appropriate or make a statement of disagreement.

## 10. Challenging Compliance with the Privacy Policy:

The client can inquire and complain about the agency's privacy practices. The privacy officer will respond to the inquiries and investigate all complaints. If a complaint is found to be justified, appropriate measures will be taken, including amending its policies and practices if necessary.

For any concerns or questions related to privacy, please contact the **CMHA Peel Dufferin's Privacy Officer** at:

7700 Hurontario St., Suite 314, Brampton, ON L6Y 4M3  
(Telephone) 905-451-1718 ext. 495  
(Fax) 905-451-1720  
(Email) [privacy@cmhapeeldufferin.ca](mailto:privacy@cmhapeeldufferin.ca)  
(Website) [www.cmhapeeldufferin.ca](http://www.cmhapeeldufferin.ca)

The Ontario **Information and Privacy Commissioner (IPC)** can be reached at:

2 Bloor Street East, Suite 1400, Toronto, ON M4W 1A8  
(Telephone) 416-326-3333  
(Fax) 1-800-387-0073  
(Email) [info@ipc.on.ca](mailto:info@ipc.on.ca)  
(Website) [www.ipc.on.ca](http://www.ipc.on.ca)