

## Hope House Community Hospice – Privacy Policy A95

Hope House Community Hospice (HHCH) is committed to protecting the privacy of the personal information of its employees, volunteers, clients, and other stakeholders by complying with the *Personal Health Information Protection Act, 2004 (PHIPA)*

HHCH protects the personal information used and gathered. Any use and release of information is subject to consent. HHCH will ensure that staff and volunteers have the appropriate understanding of privacy and how to handle private information.

HHCH will collect personal information including any factual or subjective information, recorded or not, about an identifiable individual. This includes any information in any form, such as:

- Age, name, ID numbers, income, ethnic origin, or blood type
- Opinions, evaluations, comments, social status, or disciplinary actions.
- Employee files, credit records, loan records, medical records, existence of a dispute, or intentions.

Personal information does not include the name, title, business address, or telephone number of an employee of an organization.

HHCH collects, uses, and discloses personal information in order to serve clients. For clients, health history, physical condition, and social/cultural status information are collected in order to help assess health needs and determine how to best meet those needs. For volunteers and student placements, information about their backgrounds, social/cultural status and availability are collected in order to best match them with clients. Clients and volunteers are also often contacted with information about HHCH (e.g., seminars, celebrations, fundraising). For both clients and volunteers, consent is received to gather personal information for these purposes. For employees, the primary purpose for collecting personal information is to ensure that all practices related to the *Employment Standards Act* and *Occupational Health and Safety Act* are followed (e.g., tax deductions, emergency contacts).

HHCH will protect personal information by adhering to the following principles:

- **Accountability:** HHCH is responsible for all personal information under its control including any personal information disclosed to third parties for processing.
- **Identifying Purposes:** HHCH will identify the purposes for collecting personal information prior to or at the time it is being provided. Personal information will not be used for a purpose not previously identified without further individual consent, unless the new purpose is required by law.
- **Consent:** The knowledge and consent of the individual is required for the collection, use, or disclosure of personal information, except where inappropriate.
- **Limiting Collection:** The collection of personal information shall be limited to that which is necessary for the purposes identified by HHCH.
- **Limiting Use, Disclosure, and Retention:** Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.
- **Accuracy:** Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
- **Safeguarding Personal Information:** HHCH protects personal information with safeguards appropriate to the sensitivity of the information, using password protocols and encryption software when required.
- **Openness:** HHCH will make specific information about its personal information management practices readily available to individuals.
- **Access:** Upon request, HHCH will inform individuals of the existence, use, and disclosure of their personal information and provide access to that information. An individual shall be able to verify the accuracy and completeness of their information and may request that it be amended, as appropriate.

**Handling Complaints and Suggestions:** HHCH has procedures to receive and respond to complaints or inquires about policies and practices relating to the handling of personal information. See Policy CS240.

**Retention and Destruction of Personal Information:**

HHCH will keep volunteer and employee records for 7 years (post-discontinuation of volunteering or employment) in the main office. Client files will be kept for ten years (post-discharge or death). The records/documentation will be maintained in a secure storage system with limited access. Paper files containing personal information will be destroyed by shredding.

The Privacy Officer for HHCH is the Executive Director.