



Therapeutic services for
those affected by trauma

Privacy Policy

1. Purpose

The purpose of this policy is to inform the reader about Cedar Centre's privacy practices and compliance with privacy legislation. It is also intended to provide guidance to Cedar Centre staff, contractors, students and volunteers concerning the protection of personal information that Cedar Centre collects and uses in the course of business.

2. Scope

This policy applies to all Cedar Centre staff, contractors, students and volunteers.

3. Policy

Legal Compliance

Cedar Centre complies fully with the applicable privacy legislation governing the collection, use, protection and disclosure of personal information (Freedom of Information and Protection of Privacy Act, RSO 1990: FIPPA) and personal health information (Personal Health Information Protection Act, 2004: PHIPA).

The Executive Director is the Centre's designated Privacy Officer and has the responsibility for enforcing this policy. Anyone with questions about this policy or wishing to have access to their personal information at Cedar Centre may contact the Privacy Officer as follows:

Executive Director
Cedar Centre

privacyofficer@cedarcentre.ca

Tel: 905-853-3040 ext. 305
Fax: 905-853-1023

Privacy legislation is readily available on the Internet, along with guides to understanding the law and instruction on how to contact the government to report a suspected violation.

4. Definitions

Personal information is recorded information about an identifiable individual. Business contact information is not considered by the legislation to be personal information.

Personal health information: is recorded information that includes oral or written information about an individual, if the information:

- Relates to the individuals' physical or mental health, including family health history;
- Relates to the provision of health care, including the identification of persons providing care;
- Is a plan of service for individuals requiring long-term care;
- Relates to payment or eligibility for health care;
- Relates to the donation of body parts or bodily substances or is derived from the testing or examination of such parts or substances;
- Is the individual's health number; or
- Identifies an individual's substitute decision-maker.

Any other information about an individual that is included in a record containing personal health information is also included in the definition.

Third parties: individuals or organizations other than the subject of the records or representatives of "The Centre". Note that in certain circumstances, the Agency may be entitled to provide personal information to an external party acting as an agent of "The Centre".

5. Responsibilities

The Executive Director of Cedar Centre shall ensure compliance to this policy/procedure.

All agency staff, contractors, students and volunteers are responsible for carrying out responsibilities as delegated and complying with this policy/procedure.

6. Procedures

Collection and Disclosure of Personal Information

Cedar Centre collects information about individuals such as vendors, members and participants. Information is collected only to the extent necessary for conducting business and service relationships and for complying with legal or regulatory requirements.

Cedar Centre also collects personal information about employees and applicants in order to administer the employer/employee relationship and meet various reporting obligations (e.g., administer payroll, benefits, meet insurance obligations, etc.).

Only the amount and type of information that is necessary for these purposes will be collected, and where practical, the Centre will collect it directly from the individual.

This information is not disclosed unnecessarily within Cedar Centre, or disclosed externally without the individual's consent except as required to meet legal or regulatory requirements.

Cedar Centre uses personal information and personal health information only for reasonable and justifiable business purposes that are usually explained when information is collected. Where external disclosure is required, we disclose only what is necessary and endeavour to ensure the other party is aware of their obligations under privacy legislation.

Consent

In most cases we require the individual's consent to the collection and use of personal information. We will obtain specifically stated consent where the sensitivity of the information or our use of it warrants this. In other circumstances, we rely on implied consent as allowed by the legislation and in line with normal business practice. Consent is not required for the collection of personal employee information that is necessary for administering the employer/employee relationship.

Whether consent has been stated or implied, the individual is free to withdraw consent at any time by contacting Cedar Centre's Privacy Officer. However, the withdrawal of consent may affect some aspects of our business relationship with the individual that require the information.

Personal information may be obtained without consent in situations allowed by the legislation (e.g., investigations of a breach of law or contract, emergency situations and situations where the individual might be unavailable to give consent due to illness).

Accessing and Correcting Personal Information

Privacy legislation entitles the individual to access any personal information Cedar Centre has about them. Cedar Centre will respond within the period required by the legislation. Accessing the information may be subject to a fee as allowed by the law. Cedar Centre will not charge a fee for access to employee personal information.

An individual wishing to change any personal information about them in our records may make a request to the Privacy Officer in writing. When we make the change, we will send correction notifications to any other organizations to whom we disclosed the information. If we decide not to change the information, we will attach a note to the information that a request for change was received.

The law requires that access to personal information be restricted or denied in certain circumstances. For example, we cannot allow access where doing so might reveal personal information about another individual or expose confidential commercial information. If we are unable to give someone access to their information, we will advise them of this in writing with an explanation that includes reference to the relevant section of the legislation.

Security of Information

Cedar Centre will take reasonable measures to protect personal information and personal health information from loss, alteration or illegal disclosure. Access will be allowed only on a need-to-know basis. Inactive records containing personal information or personal health information will be destroyed when legally allowable and using secure procedures.