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CAO Approved: N/A

TITLE: Notice of Privacy and Information Practices	Edocs No.: 2799765v7 Original Approval Date: October 14, 2004 Policy Last Updated: September 1, 2017 Posted on Intranet: November 11, 2013
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The Community and Health Services Department of The Regional Municipality of York recognizes that protecting the privacy of your personal health information is an essential part of our commitment to quality service, programs and care. We believe our clients should know what personal health information we collect, how we use it, to whom we disclose it and how we protect it. We are dedicated to collecting, using and disclosing your personal health information responsibly. We comply with the *Personal Health Information Protection Act, 2004*, the *Municipal Freedom of Information and Protection of Privacy Act*, and all other applicable legislation. To learn more about our information practices, please consult our Privacy and Information Practices Policy or contact our Privacy Contact Person listed below.

PERSONAL HEALTH INFORMATION

Personal health information is information in any form that identifies you and that relates to your health and health care including health history, health care programs and services, health care providers, substitute decision makers, health card number and other personal identification numbers.

YOUR CONSENT AND PERSONAL HEALTH INFORMATION

The health information custodians of the Community and Health Services Department will only collect, use and disclose your personal health information with your consent or as required or permitted by law. You may change your mind and withdraw this consent at any time by providing notice to the Community and Health Services Department provided there are no legal requirements to prevent this.

For example, the Maple Health Centre and Newmarket Health Centre provide religious and spiritual care to interested residents and for this reason, may ask you about your religious or spiritual affiliation. If you are not interested in receiving religious and spiritual care, simply inform admissions staff and the Maple Health Centre and Newmarket Health Centre will not collect such information. You may change your mind about receiving or no longer receiving religious and spiritual care at any time by advising a member of your care team. For more information on consent and personal health information, please consult our Privacy and Information Practices Policy or contact our Privacy Contact Person.

HOW WE COLLECT PERSONAL HEALTH INFORMATION

The health information custodians of the Community and Health Services Department may collect personal health information directly from you or another person who may act on your

behalf such as a substitute decision maker or a parent or legal guardian of a minor. We may also collect personal health information about you from other sources if your consent has been obtained or if the law permits or requires the collection.

WHY WE COLLECT PERSONAL HEALTH INFORMATION

The Community and Health Services Department's health information custodians may collect personal health information for:

- the provision or assisting in provision of health care
- planning or delivering health programs or services
- arranging referrals, providing supportive counselling and establishing interventions
- health protection, health promotion and awareness
- public health administration and monitoring
- administering and managing the health care system
- purposes related to the function of the Medical Officer of Health pursuant to the *Health Protection and Promotion Act*
- conducting research and compiling statistics
- fundraising
- purposes permitted or required by law
- compliance with legal and regulatory requirements

HOW WE USE PERSONAL HEALTH INFORMATION

The health information custodians of the Community and Health Services Department may use personal health information for the purposes for which it is collected, as listed above, as well as for the purposes of maintaining or improving the quality and efficiency of health care rendered or health programs or services provided, for obtaining payment for health care rendered or related goods and services provided and for other uses permitted or required by law. To learn more about the purposes for which we use your personal health information, please consult our Privacy and Information Practices Policy or contact our Privacy Contact Person.

WHEN DO WE DISCLOSE YOUR PERSONAL HEALTH INFORMATION

The health information custodians of the Community and Health Services Department will not disclose your personal health information with any external person or entity without your consent unless it is permitted or required by law.

For example, we may share your personal health information without your consent:

- with health care professionals for the purpose of providing you health care when it is not reasonably possible to obtain your consent, for example you are seriously ill or mentally incapacitated,
- with public health authorities such as the Chief Medical Officer of Health and Medical Officers of Health,
- with a person carrying out an inspection or investigation authorized by a warrant or by law,
- where it is necessary to eliminate or reduce a significant risk of serious bodily harm,
- pursuant to a summons, subpoena or court order, and
- to the Children's Aid Society.

To learn more about the purposes for which we disclose your personal health information, please consult our Privacy and Information Practices Policy or contact our Privacy Contact Person.

HOW WE PROTECT PERSONAL HEALTH INFORMATION

The Community and Health Services Department's health information custodians are committed to protecting the privacy, confidentiality and security of personal health information held in any form. We employ physical, organizational and technological safeguards to protect your personal health information against theft and loss, as well as unauthorized access, copying, modification, use, disclosure and disposal.

All staff that comes into contact with your personal health information is aware of its sensitive nature and are trained in the appropriate use, disclosure and protection of your personal health information. Staff will ensure the amount and type of personal health information collected, used or disclosed is limited to that which is necessary to fulfill the purpose for which it was collected.

We also require organizations that perform services or provide programs on our behalf to protect the privacy of your personal health information and to use such information only for the purposes you have consented to or that are permitted or required by law.

Finally, subject to certain exceptions, the health information custodians will notify you at the first reasonable opportunity if your personal health information in our custody or control is stolen, lost or accessed by unauthorized persons.

YOUR RIGHTS

Under our Privacy and Information Practices Policy, you have the right to be informed about the purposes for which the health information custodians of the Community and Health Services Department collects, uses and discloses your personal health information, as well as the right to:

- **Request Access:** You have the right to request and be granted access, subject to limited exceptions, to your own personal health information in the custody or control of the health information custodians of the Community and Health Services Department by contacting the staff member from whom you received health care or health programs or services or by contacting our Privacy Contact Person. You also have the right, subject to limited exceptions, to request and receive a photocopy of your personal health information at a minimal cost.

Requests for access to any other information in the custody or control of the health information custodians of the Community and Health Services Department, other than your own personal health information, may be made under the *Municipal Freedom of Information and Protection of Privacy Act* through the Office of the Regional Clerk, 17250 Yonge Street, Newmarket, Ontario, L3Y 6Z1, 1-877-464-9675 ext. 71320.

- **Request Correction:** You have the right to request correction of your own personal health information if you believe it is incomplete or inaccurate by contacting our Privacy Contact Person.
- **Make Inquiries or Complaints:** You have the right to direct questions, comments or complaints about our Privacy and Information Practices Policy or about alleged contraventions of the *Personal Health Information Protection Act, 2004* to our Privacy Contact Person. The Privacy Contact Person will investigate any complaints and take action to resolve such complaints.
- **Complain to the Information and Privacy Commissioner of Ontario:** You may also complain to the Information and Privacy Commissioner of Ontario if you believe that we have contravened our Privacy and Information Practices Policy, or if you are not satisfied with the handling of your inquiry or complaint, the Information and Privacy Commissioner of Ontario may be reached at:

Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto, Ontario M4W 1A8
Tel: (416) 326-3333
Fax (416) 325-9195
Email: info@ipc.on.ca

OUR PRIVACY CONTACT PERSON

Program Manager, Information Management, Access and Privacy
Community and Health Services Department
520 Cane Parkway
Newmarket, Ontario, L3Y 8T5
Tel. 1-877-464-9675 ext. 74056
Fax: (905) 895-3149