

 <b>Regional HIV/AIDS Connection</b>	Title: Privacy	Policy Number: AD Com <b>1001 P</b> Page 1 of 3
	Category: Administration Communication	Original: Jan 5, 2012 Revised: Replace:
	Executive Director Initials Approval: BL	

## Privacy Information

Regional HIV/AIDS Connection (RHAC) respects an individual's right to privacy and to protection of his/her personal information. RHAC is committed to ensuring compliance with the Ontario Privacy Protection Act and the Canadian Freedom of Information and Protection of Privacy Act. If at any time an individual wishes to be removed from any of RHAC's contact lists s/he simply needs to contact the Privacy Officer at (519)434-1601 or via email at [info@hivaidconnection.ca](mailto:info@hivaidconnection.ca)

## **Privacy Policy and Procedures**

### 1. Accountability

RHAC is accountable for the personal information under its control. RHAC is committed to protecting the privacy of an individual's personal information and recognizes its responsibility in ensuring the security of this information. RHAC has appointed a Privacy Officer who is responsible for the agency's compliance with Privacy Policies. The Privacy Officer is the Director of Client Services. RHAC will ensure that Privacy statements appear: in public areas within the agency; and on materials produced by the agency (including but not limited to: newsletters, brochures, website).

### **2. Purposes for Collection, Use and Disclosure of Personal Information:**

#### Clients/Service Users

- To determine individuals' eligibility for client services
- To assist clients with HIV related issues
- To document services provided to clients by RHAC staff and/or volunteers
- To contact clients in order to answer their questions or address concerns
- To provide relevant data to government or other funding bodies whom RHAC is required to report to (quantitative info. that does not include identifying information)
- To keep records related to the loan of materials owned by RHAC

#### Donors and Members

- To issue tax receipts for donations as required by CCRA regulations
- To issue thank you cards and recognize individuals donors/members
- To issue periodic mailings regarding RHAC, its programs and services, as well as for the purposes of fundraising and membership renewal
- To contact donors or members in order to answer questions or concerns

## Staff and Volunteers

- To administer payroll
- To determine eligibility for benefits and entitlements and in some cases the use of such benefits thereafter
- To assess qualifications
- To compile emergency contact information
- To assess development and training needs
- To document performance assessments and supervisions
- To issue periodic mailings regarding RHAC, and its programs, services and activities
- To recognize individuals' contributions

## 3. Disclosure of Information to Third Parties

Circumstances under which personal information may be disclosed to third parties:

- For the fulfillment of any purposes identified above under clients, service users, donors, members, staff and volunteers
- Harm to self or others
- As required by law

## 4. Safeguarding Personal Information

RHAC uses appropriate security safeguards with regards to protecting personal information against loss, theft, unauthorized access, disclosure, copying, or use or modification. These safeguards include but are not limited to:

- Physical safeguards – locked filing cabinets and restricted access to certain offices; using on site shredders or bonded companies to dispose of/destroy personal information
- Staff/Volunteer safeguards – limiting access on a “need to know” basis
- Technological safeguards – use of passwords and audits

RHAC adheres to existing confidentiality policies and procedures.

RHAC follows legislative requirements with respect to the length of time information must be retained. RHAC does not sell, trade or rent information to third parties.

## **5. Collecting Personal Information**

Personal information is limited to that which is necessary, as determined by RHAC. All information will be collected by fair and lawful means. Information collected will be used only for the purpose it was collected for, unless RHAC has an individual's consent to do otherwise.

## 6. Access to Personal Information

Each individual has the right to access his/her personal information. If an individual wishes to access his/her information that individual must make his/her request known to RHAC's Privacy Officer. The Privacy Officer will respond to an individual's request in a timely manner, at no cost to the individual, and in a format that is accessible to the individual. Exceptions to access will be limited and specific. Reasons for denying access may include, but are not limited to, information that cannot be disclosed for legal or security issues. Each individual who accesses his/her personal information has the right to challenge the accuracy of the information and, when appropriate, have the information changed.

## **7. Concerns, Questions and Challenges to RHAC's Compliance to Privacy Legislation**

When an individual has a concern or complaint about the agency's compliance to privacy legislation s/he will be directed to the agency's Privacy Officer (PO). This contact information will be readily provided by RHAC. The individual is expected to inform the PO either in person, by telephone, by mail, or by email. The PO will investigate the complaint and determine if RHAC has contravened the relevant laws regarding privacy as well as RHAC's own policies. The PO along with one other staff will discuss the finding of the investigation with the individual in person. If the complainant is unsatisfied with the results of the investigation they will be given the contact information for the Information and Privacy Commissioner of Ontario to whom they can make a complaint in writing. RHAC will comply with any investigation by the Information and Privacy Commissioner.