

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

THE IVAN FRANKO HOME'S COMMITMENT TO PRIVACY

PRIVACY STATEMENT

The Ivan Franko Home respects this privacy of our residents, employees, Directors, volunteers and donors. We are committed to ensuring that appropriate measure and safeguards are in place to protect specific information that is held for the purpose of our programs. We adhere to all legislative requirements with respect to privacy. We do not rent, sell or trade mailing lists. We understand that some of the information we hold on residents, employees, volunteers and donors is private, which is why we collect personal information only for the following purposes:

- To establish and maintain a responsible relationship with residents and provide appropriate service and support.
- To conduct appropriate screening procedures for those staff and volunteers who may find themselves in a position of trust with residents, other employees, volunteers, or donors.

At all times we strive to keep personal information accurate and up-to-date for the purposes identified above. Residents and donors do have choices and can refuse or withdraw consent for us to keep and use information. They may request that their name be removed from our various lists; they can refuse to provide personal information to us; and they may withdraw consent at any times. In all cases this may limit the Home's ability to provide appropriate service and support these individuals.

For further information regarding our commitment to privacy please contact the Ivan Franko Home's Privacy Compliance Officer:

Executive Director

Phone: 905-820-0573

Fax: 905-820-8134

Email: ifranko@rogers.com

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

PRIVACY POLICY

The Ivan Franko Home is committed to ensuring the privacy of our residents, employees, volunteers, and donors. We strive to keep all personal information accurate and up-to-date and we collect personal information only for the purpose of providing appropriate service and support to residents. Employees are required to provide personal information only as much as necessary to comply with appropriate legislation and regulations.

Oath of Confidentiality

During the course of their involvement with the Ivan Franko Home, members of the Home's staff, Board of Directors, and volunteers may have access to information with relation to current and past residents, staff members, donors and volunteers of the Home. To ensure the integrity and confidentiality of the Home's operations, such information must be held in strict confidence and not be shared with anyone not connected with the work of our organization. To this end and in the spirit of respect for our residents, donors, staff and volunteers, and for their personal information, everyone is asked to sign an "Oath of Confidentiality" prior to beginning their activities in connection with our Home.

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

PROCEDURES

SECURITY CHECKS

All newly-hired employees and adult volunteers must have security checks prior to beginning work at the Ivan Franko Home.

PROTECTION OF PERSONAL INFORMATION

All employees of the Ivan Franko Home will respect the privacy of residents, employees, members, Directors, volunteers, and donors. Staff will undertake to use appropriate measures and safeguards to protect specific information that is held for the purpose of the programs. Personal information will be collected only for the following purposes:

- To establish and maintain a responsible relationship and provide ongoing service and support;
- To conduct appropriate screening procedures for those volunteers and staff who may find themselves in a position of trust;
- To meet program requirements.

At all times staff will strive to keep personal information accurate and up-to-date for the purposes identified above. Questions and concerns regarding the collection and/or use of personal information will be directed to the Privacy Compliance Officer, i.e. the Executive Director.

WITHDRAWAL OF CONSENT FOR COLLECTION/USE OF INFORMATION

Residents, volunteers, and donors may request that their name be removed from our various lists at any time. Requests should be in writing and be directed to the organization's Privacy Compliance Officer. Residents and donors can also refuse to provide personal information to the Ivan Franko Home. In all cases this may limit the Home's ability to provide appropriate service and support to these individuals.

GIFT ACCEPTANCE POLICIES

Donor Confidentiality

A donor's wishes regarding recognition or anonymity regarding a gift shall be respected, provided that any recognition is consistent with the Home's usual standards or practice and legal requirements.

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

Donor Recognition

The Home shall recognize donors in a manner consistent with the recognition afforded donors of gifts of similar magnitude, immediacy of effect and degree of restriction.

PERSONNEL POLICIES AND PROCEDURES

The Ivan Franko Home in its relationship with its employees, will continually strive to maintain accurate employee records/personnel information and safeguard their privacy at all times. Employees have the right to review, update, and/or correct personnel information collected by the organization. Requests to review the information held shall be directed to the Administrator.

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

RESIDENT INFORMATION: IVAN FRANKO HOME'S PRIVACY POLICY

PURPOSE

The Ivan Franko Home is committed to protecting the privacy and security of the personal and personal health information (in accordance with *Personal Health Information Protection Act, 2004 and Long-Term Care Act, 1994*), and confidential information of its residents and staff, if applicable. This policy governs the collection, use and disclosure of personal and personal health information in our custody.

POLICY

1. Definition of Personal Health Information and Personal Information

- (1) For the purposes of this policy, *Personal Health Information* is any identifying information about an individual that is in verbal, written or in electronic form and relates to the following:
- physical or mental health, including family health history
 - care previously provided, including the identification of people or organization providing care
 - a plan of service (under the *Long-Term Care Act, 1994*)
 - payments or eligibility for health care
 - donation of body parts or bodily substances (e.g. blood), or information derived from the testing of these body parts or substances
 - an individual's health number or
 - the name of an individual's substitute decision-maker
 - individuals do not have to be named for information to be considered personal health information. Information is "identifying" if someone can reasonably figure out who the person might be or can deduce a person's identity based on key pieces of information.

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

(2) For the purposes of this policy, *Personal Information* is any identifying information about an individual that is in verbal, written or in electronic form and relates to the following:

- bank or credit card numbers
- income and payroll information (except those that meet the provincial disclosure requirements)
- Social Insurance Numbers
- home address and phone numbers
- copies of resumes disclosed to the organization
- performance reviews
- emergency contact information
- other similar information

2. Collection, Use and Disclosure

(1) Before we collect personal or personal health information, we will explain the purpose for its collection.

(2) We may *collect* personal or personal health information without your knowledge or consent:

- if it is clearly in your interests and consent is not available in a timely way
- if knowledge and consent would compromise the available or accuracy of the information and collection is required to investigate a breach of an agreement or contravention of a federal or provincial law
- if it is publicly available as specified in the regulations

(3) We may *use* personal or personal health information without your knowledge or consent:

- for emergencies
- for statistical or scholarly study or research (we may notify the Information Privacy Commissioner of Ontario before using the information, where necessary)
- if the use is clearly in your interest and consent is not available in a timely way
- if knowledge and consent would compromise the availability or accuracy of the information and collection was required to investigate a breach of an agreement or contravention of a federal or provincial law

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

(4) We may *disclose* personal or personal health information without your knowledge or consent only:

- to a lawyer representing the organization
- to comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction
- to a government institution that has requested the information, identified its lawful authority, and indicated that disclosure is for the purpose of enforcing, carrying out an investigation, or gathering intelligence relating to any federal, provincial or foreign law
- to an investigative body named in the applicable legislation or regulations or government institution on our initiative when we believe the information concerns a breach of an agreement, or a contravention of a federal, provincial, or foreign law, or suspect the information relates to national security or the conduct of international affairs
- in an emergency threatening your life, health, or security (we will inform you of the disclosure)
- for statistical, scholarly study or research (we will notify the Information Privacy Commissioner of Ontario before disclosing the information)
- to an archival institution (if applicable and we will inform you of the disclosure)
- if it is publicly available as specified in the applicable regulations
- if required by law
- if made by an investigative body for the purpose related to the investigation of a breach of an agreement or a contravention of a federal or provincial law

3. Consent

(1) You will be deemed to consent to the collection, use or disclosure of the personal or personal health information if, when the information was given, the purpose would be obvious to a reasonable person.

(2) If you have voluntarily provided information, you have consented to the collection, use and disclosure of your personally identifiable information as described in the Privacy Policy. As required by the CSA Model code, the Ivan Franko Home will not use personal or personal health information for any purpose other than that for which you consented. Should the Ivan Franko Home require personal and personal health information for a new purpose, we will contact you to seek consent for that new use.

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

(3) Information that has been collected prior to the implementation of this Privacy Policy will be used only in accordance with the purposes enumerated in this Privacy Policy. Should an organization wish to review the information that has been collected in the past, they are invited to contact the Administrator.

4. Retention and Disposal of Personal Information

(1) We will only retain personal or personal health information as long as necessary to satisfy the purpose for which it was obtained or to meet the retention requirements under PHIPA.

(2) We will destroy documents containing personal or personal health information once the information has served the purpose for which it was obtained, unless it must be retained for legal purposes.

5. Accuracy of Personal Information

(1) When we collect, use or disclose your personal or personal health information, we will make reasonable efforts to ensure that it is accurate to the extent necessary to fulfill the purposes for which it was obtained.

(2) You may submit a written request to us to correct any errors or omissions in any of your personal or personal health information that is in our custody. We will either amend the information or notify you of any reasons why such an amendment cannot be made.

6. Protection of Personal and/or Personal Health Information

(1) We recognize the importance of protecting your personal or personal health information and will use the appropriate security safeguards to provide the necessary protection. This includes:

- physical measures such as locked filing cabinets, alarm systems and restricting access to areas in which personal information is stored
- technological resources such as firewalls, encryption software and passwords
- organizational controls including security clearance measures, staff training, the use of confidentiality agreements and limiting access to only those who need the information

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

(2) We expect you to assist us in protecting personal or personal health information and to take all appropriate measures to safeguard personal information belonging to you. This includes ensuring that:

- any individuals who have requested personal or personal health information and those to whom you are sending it are authorized to receive the information
- the method by which the information is transmitted (e.g. email, fax, telephone, etc.) will adequately protect the confidentiality of the information in light of its sensitivity.

**THE IVAN FRANKO HOME'S RESPONSIBILITIES REGARDING RESIDENT
PRIVACY**

- Maintain only the information that is relevant and necessary to sustain quality of care.
- Wherever possible, collect information directly from the resident or the resident's substitute decision-maker (Power of Attorney).
- Allow only its employees to collect, use, disclose, retain or dispose of PHI on its behalf and only when authorized.
- Make sure policies exist that protect PI/PHI and identify the practices it implements to comply with HIPA.

RESIDENT RIGHTS REGARDING PRIVACY ISSUES

Under HIPA, residents may:

- Determine what personal records are collected, maintained, used or disseminated by the Ivan Franko Home.
- Prevent their records from being used for any purpose without their consent.
- Gain access to their records, subject to HIPA exemptions.
- Amend or correct a record if it is inaccurate, irrelevant, untimely or incomplete.

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

**PRIVACY OF INFORMATION AND CONFIDENTIALITY
POLICY AND AGREEMENT FOR STAFF AND VOLUNTEERS**

Privacy of Information and Confidentiality Policy

Residents have the right to protection of all their personal information. Each Ivan Franko Home staff member and volunteer must support the resident's right to privacy. Ivan Franko Home staff and volunteers must be committed to maintaining the privacy and confidentiality of residents and their associated personal and personal health information. Breaches of privacy place the organization at risk.

A condition of employment/volunteering at Ivan Franko Home is that all employees/volunteers sign a Privacy of Information and Confidentiality Agreement. This agreement is placed in the employee's/volunteer's file. This agreement is renewed at regular intervals (with the annual performance review). Failure to hold the personal information of residents confidential and private may lead to disciplinary action, which may include termination of employment or volunteer position.

Breaches of confidentiality include accessing personal information without authorization to do so and without a need-to-know.

IVAN FRANKO HOME
Пансіон Ім. Івана Франка

**EMPLOYEE/VOLUNTEER PRIVACY OF INFORMATION AND CONFIDENTIALITY
AGREEMENT:**

Name of employee/volunteer: _____

Department: _____

I acknowledge that during my employment/volunteer work with Ivan Franko Home, I will have access to personal information about residents, their families, and other employees/volunteers, which is of a private and confidential nature.

At all times I will respect the privacy of residents, their families, and other employees/volunteers.

I will treat all Ivan Franko Home's clinical, administrative and financial information about residents, their families, and other employees/volunteers as confidential information.

I will ensure that private and confidential information is not inappropriately accessed, used or disclosed either directly by me or by virtue of my password to systems.

I understand that violations to privacy and confidentiality may include but are not limited to:

- Accessing personal information that I do not require for work/volunteer purposes
- Misusing or disclosing personal information without proper authorization
- Altering personal information of residents or other employees
- Disclosing to another person my username and password to enable unauthorized access to personal information

I will only access, use and transmit private and confidential information using Ivan Franko Home authorized hardware, software or other equipment, as required by the duties of my position.

I understand and agree to abide by the conditions outlined in this agreement, which will remain in force even if I cease to have an association with the Ivan Franko Home.

I understand that if any of these conditions are breached, I may be subject to disciplinary action that may include termination of employment or volunteer position.

Name (please print): _____

Signature: _____

Date: _____

Name of Witness (please print): _____

Signature: _____

Date: _____