

## PRIVACY POLICY

### *Intent*

The information entrusted to us and its safekeeping is of utmost importance. HVE Healthcare Assessments has adopted this Policy to ensure that all HVE resources are aware of our commitment to the privacy and protection of personal information.

Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to HVE Healthcare Assessments' daily operations.

HVE Healthcare Assessments strives to protect and respect the personal information of its customers, persons served, employees and business partners, and so on in accordance with all applicable regional and federal laws. Each resource member of HVE Healthcare Assessments must abide by the organization's procedures and practices when handling personal information.

### *Guidelines*

#### **Requirement of Confidentiality**

In accordance with the Privacy Act, PIPEDA (Personal Information Protection and Electronic Documents Act), and PHIPA\* (Personal Health Information Protection Act), HVE Healthcare Assessments will handle sensitive personal, and personal health information in a confidential and appropriate manner in alignment with these regulations. Any request for information will be directed to the referral source. The Referral Source will be advised of all requests for information from HVE Healthcare Assessments.

#### **Confidentiality Agreement**

The following is classed as Confidential Information:

- Client lists and service agreements
- Claimant personal information
- Claimant medical histories
- Human resources
- Policies or procedures
- Company financial information, status and statements
- Any information, or documentation labelled "Confidential" by the Company, or listed as such by separate memorandum, or e-mail that informs of confidential status
- Any information pertaining to (HVE Healthcare Assessments' customers, persons served and visitors)

#### **Identifying Purposes**

HVE will identify the purpose for the collection of personal information prior to, and/or at the time of collection. Only personal information relevant to this purpose will be collected. This information will be collected through fair and lawful means.

## **Limiting Use, Disclosure and Retention**

The personal information collected will not be used or disclosed for any other purpose than that for which it was originally collected, unless consent is provided or as required by law. Personal information shall be retained only for as long as is necessary for fulfillment of the identified purposes.

## **Nondisclosure**

In working for HVE Healthcare Assessments, resources shall not divulge, disclose, provide or disseminate Confidential Information to any third party not employed by HVE Healthcare Assessments at any time, unless HVE Healthcare Assessments gives written authorization. Furthermore, Confidential Information shall not be used for any purpose other than its reasonable use in the normal performance of employment duties for HVE Healthcare Assessments.

## **Consent**

The knowledge and consent by an individual of the collection, use and disclosure of personal information is critical. Provision of personal information is voluntary and done with an individual's express consent, except when inappropriate. Consent may be withdrawn at any time subject to legal and contractual restrictions.

## **Safeguards**

All personal information is protected by security safeguards appropriate to the sensitivity of the information.

## **Accountability**

HVE is responsible for the personal information under its control. We have appointed a Privacy Officer to ensure compliance with the privacy legislation and to address any issues and/or concerns related to this.

## **Accuracy**

HVE shall ensure accuracy of the personal information collected as best as possible. If there is an error in an individual's personal information, the individual may request for it to be corrected with provision of documentation if necessary.

## **Access**

Upon request, and receipt of a completed HVE Healthcare Assessments Authorization Form, an individual will be provided with access to the personal information held regarding them. They will be informed of the use and disclosure of this information and may challenge the accuracy and/or completeness of this information and request for the information to be corrected and/or amended as appropriate.

## Openness

HVE will make specific information readily available regarding its policies and practices relating to the handling and management of personal information and personal health information under its control.

## Compliance

HVE has two appointed Privacy Officers who are accountable to ensure HVE's compliance with all facets of our privacy policy. They are also charged with the responsibility of keeping abreast of new and/or updated Privacy Legislation at a Federal and Provincial level including but limited to Personal Information Protection and Electronic Documents Act (PIPEDA) and the Personal Health Information Protection Act (PHIPA).

## Company Property

Upon termination of employment with HVE Healthcare Assessments, resources shall promptly return (without duplicating or summarizing), any and all material pertaining to HVE Healthcare Assessments business in their possession including, but not limited to: all client information (charts, lists, etc.), physical property, documents, keys, electronic information storage media, manuals, letters, notes and reports.

## Communication

Changes to our Privacy Policy either based on requirements by legislation, customer or corporate need will be relayed to all HVE resources and assessors via management meetings, team knowledge transfer sessions and e-mail notifications. Customers will be advised via their respective program managers. Claimants will be notified via the Rights of Persons Served Handbook in every HVE assessment room and by updated posters at all HVE owned assessment centres.

## Legal

This agreement will not supersede any legal obligation to disseminate information when required to do so in a court of law.

*\*The Personal Health Information Protection Act (PHIPA), 2004 is an Ontario law that governs the collection, use and disclosure of personal health information within the health sector. The object is to keep personal health information confidential and secure, while allowing for the effective delivery of health care. Under this legislation, persons and organizations that provide health care are collectively known as health information "custodians".*

## Acknowledgement and Agreement

I, \_\_\_\_\_, acknowledge that I have read and understand the Privacy Policy of HVE Healthcare Assessments. Further, I agree to adhere to this policy and understand that if I violate the rules outlined in this policy, I may face disciplinary action, up to and including termination of employment.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_