



## ORGANIZATIONAL POLICIES AND PROCEDURES

### Section: Administration - Confidentiality

Confidentiality Policy	Date Approved:	January 2018
	Director Responsible:	Vice President, People and Culture
	Date for Review:	January 2022

#### PURPOSE

There is a need to balance access to information and maintaining the privacy and security of all employee, volunteer and client related information. An appropriate balance is required between the need to:

- protect confidential information of clients, volunteers and employees, and assure them that only authorized staff will have access to personal information
- share access to the information with appropriate providers to develop and sustain an integrated team and facilitate care planning of clients

#### DEFINITIONS

#### SCOPE

The entire organization

#### POLICY

KidsAbility strives to provide a safe, secure environment for all employees and clients. Part of this endeavor requires that all employees, volunteers and students review, understand, and agree to the confidentiality parameters that govern their particular service areas, as well as KidsAbility as a whole. All employees confirm their responsibilities through an annual Confidentiality Agreement.

#### PROCEDURE

1. The following statutes and legislative guidelines require the protection of personal information by physical, organizational and technological safeguards appropriate to the sensitivity of the information. The applicable statutes include the following:
  - Personal Health Information Protection Act (PHIPA),
  - Freedom of Information and Protection of Privacy Act (FIPPA),
  - Personal Information Protection and Electronic Documents Act (PIPEDA),
  - Municipal Freedom of Information and Protection of Privacy Act (MFIPPA),
  - Ontario Education Act, and
  - Child & Family Services Act (CFSA)
  - KidsAbility confidentiality and protection of privacy policies,
2. Responsibilities
  - All employees, volunteers and students agree to protect from unauthorized uses and disclosures all restricted, personal information, including personal health information of clients, to which they may have access in the course of employment or volunteer activities with KidsAbility.
  - KidsAbility employees, volunteers and students will collect only the information that is necessary to support the purpose and shall only access as much information as required in the performance of their duties.
  - Personal health information is to be available to Service Providers in the performance of their duties on a limited need-to-know basis.

- All employees, volunteers and students shall agree to use personal information only for the purposes for which it was collected and purposes consistent with employment or volunteer responsibilities.
  - All employees, volunteers and students agree to abide by KidsAbility policies for disclosure and release of information and will only disclose personal information as permitted by law.
  - Managers shall implement safeguards appropriate to privacy and security of personal information policies and procedures of their organizations.
  - In addition to understanding and complying with KidsAbility policies and procedures, service providers are responsible for ensuring they are aware of the safeguards used by their partner organizations.
  - Any discipline or sanctions, up to and including dismissal, may result if an employee or volunteer accesses, collects, uses, discloses, or disposes of personal information that contravenes legal obligations or KidsAbility's established policies and procedures.
  - The obligations of this Agreement will survive the termination of employment or volunteer activities at KidsAbility and that failure to keep confidential the personal information of individuals including personal health information, is grounds for appropriate disciplinary and/or legal action.
  - The annual Confidentiality Agreement requires full review of KidsAbility confidentiality policies:
    - Confidentiality Policy
    - Notice of Use of Health Information (Health Records)
    - Computer Use Policy
    - Confidentiality Breach
3. If an employee, volunteer or student become aware of any personal information that is lost, shared in an unauthorized way, or any other form of privacy breach they are required to notify the KidsAbility Privacy Officer immediately.

#### **REFERENCE**

Oath of Confidentiality (Form)

#### **APPENDICES**