

POLICY 1.1**PRIVACY****DATE ADOPTED/REVISED:****April 2006****PRIVACY POLICY**

Privacy of personal information is an important principle to Vista Centre. We are committed to collecting, using, and disclosing personal information responsibly and only to the extent necessary for the services we provide. We also try to be open and transparent as to how we handle personal information. This document describes our privacy policies.

PROCEDURE**WHAT IS PERSONAL INFORMATION?**

1. Personal information is information about an identifiable individual. Personal information includes information that relates to personal characteristics (e.g. gender, age, income, home address, phone number, family status), health (e.g. health history, health conditions, health services received), and activities and views (e.g. religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual).
2. Personal information is different from business information (e.g., an individual's business address and telephone number which is not protected by privacy legislation).
3. Vista Centre includes at the time of writing, an Executive Director, Program Managers, Residential and Supported Independent Living (SIL) Counsellors, On-Call/Relief staff, an Administrative Assistant, and a ten member volunteer Board of Directors. We use a number of consultants and agencies that may, in the course of their duties have limited access to personal information. These include computer consultants, accountants, accreditation surveyors, and lawyers. Vista Centre provides opportunities for students and volunteers who may, in the course of their duties have limited access to personal information. We restrict access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

PERSONAL INFORMATION: PRIMARY PURPOSES

About Clients

4. We collect, use, and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal information is to provide support to individuals living with the effects of an acquired brain injury. We collect information about a client's health history, including family health history, physical condition, function, and social situation in order to help us assess what supports are needed and to advise them of their options. This information is also used to identify changes which occur over time, and modify the ongoing support provided to an individual as needed. It would be rare for us to collect such information without the client's expressed consent, but this might occur in an emergency (e.g. the client is unconscious) or where we believe the client would consent if asked and it is impractical to obtain consent (e.g. a family member passing a message on from our client and we have no reason to believe that the message is not genuine).

About Members of the General Public

5. For members of the general public, our primary purposes for collecting personal information are to provide notice of special events (e.g. fundraiser) or to make them aware of Vista Centre's services. For example, while we try to use work contact information where possible, we might collect home addresses, fax numbers, and email addresses. We try to obtain consent before using any such personal information, but where this is not for any reason, possible, we will, upon request, immediately remove any personal information from our distribution list.

On our website we only collect, with the exception of cookies, the personal information that you provide and use that information for the purpose you gave it to us (e.g. to respond to your email message, or to subscribe to our newsletter). Cookies are only used to help you navigate our website and are not used to monitor you.

About Contract Staff, Volunteers, and Students

6. For people who are contracted to do work for us our primary purpose for collecting personal information is to ensure we can contact them in the future (e.g. for new assignments), and for necessary work-related communication. (e.g. year end tax receipts). Examples of the type of personal information we collect for those purposes include home addresses and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of health emergency (e.g. SARS outbreak), or to investigate a possible breach of law (e.g. theft). If contract staff, volunteers, or students wish a letter of reference or an evaluation we will collect information about their work related performance and provide such a report as authorized by them.

PERSONAL INFORMATION: RELATED AND SECONDARY PURPOSES

7. Like most organizations, we also collect, use and disclose information for purposes related to, or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:
 - To invoice clients for services that were not paid for at the time, or to collect unpaid accounts
 - To advise clients and others of special events or opportunities (e.g. fundraising event, development of a new service)
 - Our agency reviews client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external consultants (e.g. auditors, lawyers, practice consultants, voluntary accreditation programs) may, on our behalf, do audits and continuing quality improvement reviews of Vista Centre, including reviewing client files and interviewing our staff
 - As professionals, we will report serious misconduct, incompetence, or incapacity of other practitioners, whether they belong to other organizations or our own. Also, our organization believes that it should report information suggesting serious illegal behaviour to the authorities. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients, or other individuals, to support the concern (e.g. improper services). Also, like all organizations, various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission etc.) have the authority to review our files and interview our staff as part of their mandates. In these circumstances, we may consult with professionals (e.g. lawyers, accountants) who will investigate the matter and report back to us.

- The cost of some goods/services provided by the organization to the clients is paid for by third parties (e.g. OHIP, WSIB, private insurance, Assistive Devices Program). These third party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.
- Clients or other individuals we deal with may have questions about our goods or services after they have been received. We also provide ongoing services for many of our clients over a period of months or years for which our previous records are helpful. We retain our client information for a minimum of ten years after the last contact to enable us to respond to those questions and provide these services.

You can choose not to be part of some of these related or secondary purposes (e.g. by declining to receive notice of special events or opportunities). We do not, however, have a choice about some of these related or secondary purposes (e.g. external regulation).

PROTECTING PERSONAL INFORMATION

8. We understand the importance of protecting personal information. For that reason we have taken the following steps:
 - Paper information is either under supervision or secured in a locked or restricted area
 - Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers. All of our cell phones are digital, which signals are more difficult to intercept.
 - Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies
 - Electronic information is transmitted either through a direct line or is anonymized or encrypted.
 - Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
 - External consultants and agencies with access to personal information must enter into privacy agreements with us.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

9. We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

We keep our client files for 10 years. Our client and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again. However, if you ask, we will remove such contact information right away. We keep any personal information relating to our general correspondence (i.e. with people who are not our clients) newsletters, seminars and fundraising activities for six months after the newsletter ceases publication or an event is over)

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it. When the hardware is discarded, we ensure that the hard drive is physically destroyed.

YOUR ACCESS TO INFORMATION ABOUT YOU

11. With only a few exceptions, you have the right to see the personal information we hold about you. Often all you have to do is ask. We can help you identify what records we may have about you. We will also try to help you understand any information that you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity before providing you with this access. We reserve the right to charge a nominal fee for such requests. If there is a problem, we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best as we can, as to why we cannot give you access.

If you believe there is a mistake in the information, you have a right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have formed. We may ask you to provide documentation that your files are inaccurate. Where we agree that a mistake has been made, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we made a mistake, we will still agree to include in the file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

DO YOU HAVE A QUESTION?

12. Vista Centre's Information Officer is the Chairperson of the Information Management Committee and can be reached at:

214-211 Bronson Ave
Ottawa, ON, K1R 6H5
Phone: (613) 234-4747

We will attempt to answer any questions or concerns you might have. If you wish to make a formal complaint about our privacy policies, you may make it in writing to Vista Centre. We will acknowledge receipt of your complaint, ensure that it is investigated promptly, and provide you with a formal written decision with reasons.

This policy is made under the Personal Information Protection and Electronic Documents Act. That is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above. For more general inquiries: the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commission can be reached at:

Privacy Commissioner of Canada
112 Kent Street
Ottawa, ON
K1A 1H3
Phone: (613) 995-8210 / 800-282-1376 / Fax: (613) 947-6850 / TTY (613) 992-9190
www.privcom.gc.ca

Reference:
Not Applicable

Authority: Board of Directors

Signature: _____