

Policy Title	Privacy		
Original date	February 2014	Section	Governance Processes
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Privacy is important to CMHA Kelowna. In order to ensure that personal information of volunteers, employees, donors and clients remains private, we are committed to protecting individual's privacy rights and personal information.

A *privacy officer* is appointed by the CEO and made known to the Board and Staff.

"Personal information," means any information about a specific, identifiable individual, including commonly available details as name, address, telephone number and email address.

We will not be share, trade, or sell personal information. This responsibility extends when personal information is transferred to or collected by service providers on our behalf. Some service providers may be located outside of Canada. We require these service providers to use your personal information only to perform the services we have retained them to provide.

We will only collect personal information relevant to the purposes indicated by the individual. Individuals have the right to provide as much, or as little personal information as they wish.

Information collected on the CMHA Kelowna web site is voluntarily provided by the individual. We explicitly note our privacy policy on our website.

From time to time, we may offer links from our web site to other web sites. We do not accept any responsibility or liability for any personal information individuals provide to other entities to which our web site may link. We encourage individuals to consult the privacy policies of the other entities prior to providing personal information on their web sites.

We generally assume the personal information that individuals have provided to be accurate and complete, unless we are informed otherwise. Subject to any legal requirements, individuals have the right to access or update personal information we hold about them and/or to withdraw their consent to the collection or use of their personal information at any time.

PRIVACY AND MANAGEMENT OF CONFIDENTIAL INFORMATION

In order to protect the legal rights of our clients/residents, employees and agents to privacy of their personal business information in our custody and control, CMHA Kelowna recognizes:

- The rights of our clients/residents and Employees to protection of privacy regarding all

aspects of their personal and business information, in keeping with the Freedom of Information and Protection of Privacy Act; and

- Our requirement to inform our clients/residents and Employees that there are circumstances that override their right to privacy when personal information will be shared with authorized individuals.

CMHA Kelowna employees who come in contact with Confidential Information as a result of their appointment with CMHA Kelowna will:

- Access/discuss only that Confidential Information that is needed to carry out their client/service responsibilities;
- Preserve confidentiality of Confidential Information while engaged in CMHA Kelowna and outside of work;
- Follow CMHA Kelowna's policy/procedure in the security and release of Confidential Information;
- Report breaches in accessing Confidential Information or maintain confidentiality, without fear of reprisal.

CMHA Kelowna considers intentional viewing of Confidential Information that is not required to carry out work-related responsibilities or misuse of Confidential Information to be a breach of access rights/confidentiality.

CMHA Kelowna will initiate action against those who breach access or confidentiality standards, up to and including dismissal, termination of privileges, and termination of contractual agreements and/or legal action.

Prior to commencing their relationship with CMHA Kelowna, Employees and Agents will sign a Privacy and Confidentiality Acknowledgement form outlining individual responsibility for access to and use of Confidential Information.

Audits will be performed to ensure compliance with this policy.

All projects or initiatives that collect, use or disclose Confidential Information must complete a Privacy Impact Assessment (PIA) prior to the implementation of the project/initiative to identify and address any impacts on privacy that may result.

There are specific procedures outlined in the CMHA Kelowna Human Resources Manual that indicate level of responsibility and processes required by our staff in order to appropriately maintain the above standard of privacy and confidentiality.

The following references were considered in the creation of this policy.

- COACH (1995). Guidelines to Promote the Confidentiality and Security of Automated Health Record Information
- Family and Child Service Act
- Freedom of Information and Protection of Privacy Act
- Hospital Act
- Hospital Insurance Act
- Interior Health (2002) Standards of Conduct for Interior Health Authority Employees
- IHA Policy: Security of Information
- IHA Policy: Release of Information