



Title: **VON CANADA
ENTERPRISE PRIVACY
POLICY**

STANDARD: 6 – PRIVACY – VON Canada has established rules and procedures for the protection of Personal Information and takes steps to protect Personal Information against theft, loss and unauthorized access, collection, use or disclosure.

Policy: VON Canada has established rules and procedures for the protection of Personal Information and takes steps to protect Personal Information against theft, loss and unauthorized access, collection, use or disclosure.

VON Canada adopts the Ten Principles of Personal Information Protection¹ as the basis of its privacy compliance program.

VON Canada also meets the standards set in each privacy statute in each Canadian jurisdiction in which it operates.

The Ten Principles of Personal Information Protection apply to all of VON Canada's undertakings and business, including its employees' Personal Information (subject to any requirements set out in specific collective agreements).

This policy and the associated privacy policies and procedures are applicable to all VON Canada employees and volunteers and to the following entities and any ventures or activities that are controlled by any of them (collectively, "VON Canada"):

- Victorian Order of Nurses For Canada
- Victorian Order of Nurses For Canada – Eastern Region
- Victorian Order of Nurses For Canada – Western Region
- Victorian Order of Nurses For Canada – Ontario Branch
- Victorian Order of Nurses For Canada Nova Scotia Branch.

Individuals who violate this Policy or any of the associated privacy policies and procedures are subject to appropriate disciplinary action by VON Canada, up to and including possible termination of employment.

Rationale: The Ten Principles of Personal Information Protection are representative of international best practices for the collection, use, protection and disclosure of Personal Information and Personal Health Information.

These ten principles are the essential elements of VON Canada's privacy compliance program. These principles apply to all sites and programs in all provinces/territories in which VON Canada operates. Any additional requirements will be set out in the related

policies for the specific privacy topic. (See attached “Ten Principle of Personal Information Protection” – Quick Reference, under Guidelines, Tools section.)

The Ten Principles of Personal Information Protection establish the basic principles for the protection of personal information and form the basis of most privacy legislation throughout the world, including Canadian privacy legislation. By building in these ten principles, VON Canada’s privacy compliance programs will align with most privacy protection legislation in Canada².

Definitions: See attached Privacy Definitions – Quick Reference, under Guidelines, Tools section.

Procedure: **VON Canada is responsible to:**

1. Approve VON Canada’s privacy policies and procedures and ensure policies, procedures and guidelines are developed and/or updated according to relevant legislation, regulatory standards and best practices.

VON Canada’s Chief Privacy Officer is responsible to:

1. Act as an expert resource to VON Canada on privacy matters.
2. Promote compliance throughout VON Canada with the VON Canada Enterprise Privacy Policy and all associated privacy policies and procedures.
3. Ensure that VON Canada establishes and maintains appropriate privacy and information practices.
4. Act as a consultant and provide advice to sites regarding access requests, privacy related inquiries and complaints, and investigations by provincial privacy commissioners.
5. Act as an advisor and facilitator to assist VON Canada in implementing privacy principles.
6. Establish, manage and monitor privacy policy in VON Canada.
7. Ensure that privacy principles are applied in VON Canada.
8. Establish requirements and standards for privacy in corporate information systems and business processes.
9. Collaborate with site leadership to ensure that VON Canada employees/volunteers are informed of their legal duties regarding privacy.
10. Conduct Privacy Impact Assessments (PIAs) as needed to facilitate program and system design.
11. Investigate and address privacy-related complaints and breaches and recommend improvements.
12. Promote privacy to internal and external stakeholders privacy training and awareness programs.
13. Review organizational practices to ensure privacy policies are implemented and followed.
14. Investigate privacy breaches and incidents and determine corrective action.
15. Respond as expeditiously as possible to requests from VON Canada employees/volunteers for advice, consults or permission to take any action under the Privacy Policies or Privacy Procedures.
16. Develop and improve privacy procedures including access, correction, inquiry and complaints procedures.
17. Develop and make available a written statement that describes VON Canada’s information practices, the Chief Privacy Officer’s contact information and VON

- Canada's access, correction, inquiry and complaints procedures.
- VON Canada's VP, Quality & Risk will act as Chief Privacy Officer in the absence or disability of the General Counsel.
 - VON Canada's Senior Director, Quality & Risk will act as Chief Privacy Officer in the absence or disability of the General Counsel and the VP, Quality & Risk.

VON Canada Manager Quality & Risk, Health Records Program is responsible to:

- Work with the Chief Privacy Officer to manage the privacy function in all regions.
- Promote compliance throughout all regions of VON Canada with the VON Canada Enterprise Privacy Policy and all associated privacy policies and procedures.
- Respond to access requests, privacy related inquiries and complaints, and investigations at the site level and by provincial privacy commissioners when requested.
- Ensure that privacy principles are applied in all regions.
- Collaborate with the Chief Privacy Officer to investigate and address privacy-related complaints, breaches and incidents and identify improvement opportunities.
- Promote privacy to regional stakeholders. Ensure that annual and periodic privacy training and awareness programs are conducted.
- Develop and distribute quarterly report on privacy practices and audit results.
- Respond to requests from VON Canada employees/volunteers for advice, consults or permission to take any action under the VON Canada Enterprise Privacy Policy and all associated privacy policies and procedures.

VON Canada Directors and Managers are responsible to:

- Comply with the VON Canada Enterprise Privacy Policy and all associated privacy policies and procedures.
- Implement privacy training and awareness programs
- Assist employees/volunteers to comply with the VON Canada Enterprise Privacy Policy and all associated privacy policies and procedures.

VON Canada Employees/Volunteers are responsible to:

- Comply with the VON Canada Enterprise Privacy Policy and all associated privacy policies and procedures.

**Guidelines,
Tools:**

VON Canada Statement of Information Practices [English](#) | [French](#)
[Privacy Legislation Application to VON Canada](#)
[Privacy Definitions – Quick Reference](#)
[Ten Principles of Personal Information Protection – Quick Reference](#)

VON Canada Management Standards Manual(MSM); Standard 6; VON Canada Privacy Policy and Procedures –

Collection, Use and Disclosure of Client Personal Information (#06-02-02):

- VON Canada Consent to the Collection, Use and Disclosure of Personal Information (Form)
- VON Canada Consent to Disclose Personal Information (Form)
- VON Canada Request to Withdraw Consent to the Collection, Use and Disclosure of Personal Information (Form)

Requests for Access to Personal Information (#06-02-03):

- Request for Access to Personal Information (Form)
- Employee/Volunteer Request for Access to Personal Information (Form)
- Sample Letters:
 - Response Letter for Request for Personal Health Information/Health Record
 - Response Letter for Request for Employee/Volunteer Record
 - Response Letter Granting Request for Personal Health Information/Health Record
 - Response Letter Granting Access to Employee/Volunteer Record
 - Response Letter When Health Record Cannot Be Located
 - Response Letter when Employee/Volunteer Record Cannot be Located
 - Denial of Request for Personal Health Information/Health Record
 - Denial of Access to Employee/Volunteer Record
 - Extension to Comply with Request for Personal Health Information/Health Record
 - Extension to Comply with Request for Access to Employee/Volunteer Record – Alberta and British Columbia
 - Abandonment Letter for Personal Health Information/Health Record
 - Abandonment Letter for Employee/Volunteer Record – Alberta and British Columbia

Requests for Correction to Personal Information (#06-02-04):

- Request for Correction to Personal Information (Form)
- Sample Letters:
 - Response Letter for Request for Correction
 - Response Letter Granting or Refusing Correction
 - Extension to Comply with Request
 - Extension to Comply with Request for Alberta and B.C.
 - Abandonment Letter
 - Abandonment Letter for Alberta and B.C.

Storage, Retention and Disposal of Personal Information (#06-02-05):

- VON Canada Personal Information Disposal Request

Privacy Breaches (#06-03-01)

- Template - Notification Letter - Ontario and Nova Scotia
- Template – Verbal Notification Script - Ontario and Nova Scotia

Acceptable Use of Resources (#06-03-01)

Personal Responsibility for Security (#06-03-02)

References: Alberta Health and Wellness, “Health Information Act Guidelines and Practices Manual”, (2007), www.health.gov.ab.ca

CSA International Model Code for the Protection of Personal Information, March 1996, http://www.media-awareness.ca/english/resources/codes_guidelines/internet/csa_private-code.cfm

Canadian Mental Health Association, Ontario, "Community Mental Health and Addictions Privacy Toolkit", (September, 2005)
<http://www.ontario.cmha.ca/privacytoolkit/index.asp?CID=5994>

Edwards, J.J., "Human Resources Guide to Workplace Privacy", (Canada Law Book, 2003)

Freedman, Bonnie, "Privacy Laws and Principles: Health Privacy Professional Workshop", University of Waterloo, April 19, 2007,
<http://media.csg.uwaterloo.ca/privacy/videoArchive.php>,

Hebda, T., P. Czar and C. Mascara, Handbook of Informatics for Nurses & Health Care Professionals, 3rd ed., (Upper Saddle River N.J: Pearson Prentice Hall, 2005)

MacIsaac, Barbara et al., "The Law of Privacy in Canada 2009 Student Edition", (Thomson Reuters Canada Limited, 2009)

Ontario Health Association, "Hospital Privacy Toolkit", (OHA, November 2004),
<http://www.oha.com/KnowledgeCentre/Library/Toolkits/Pages/Default.aspx>

Ontario Telemedicine Network, "Privacy Toolkit",
<http://www.otn.ca/en/privacy-toolkit/resource-library>

Waterloo Institute for Health Informatics Research, "Privacy Fundamentals: Putting Privacy in Context", <http://media.csg.uwaterloo.ca/privacy/videoArchive.php>

¹ CSA International Model Code for the Protection of Personal Information, March 1996, http://www.media-awareness.ca/english/resources/codes_guidelines/internet/csa_private-code.cfm

² Edwards, J.J., Human Resources Guide to Workplace Privacy, (Canada Law Book, 2003) at 12, 21.