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## INDEPENDENT LIFESTYLES POLICY AND PROCEDURE MANUAL

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### TITLE: PRIVACY POLICY

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**SECTION: OPERATIONS**  
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### POLICY STATEMENT:

***Independent Lifestyles respects your privacy rights under the Freedom of Information and Protection Privacy Act (FIPPA) and the Personal Information Protection and Electronic Documents Act (PIPEDA).***

You should know that:

- You have control over how your personal information is handled.

The following ten principles are followed:

#### **1. Accountability**

- Every effort is made to safeguard the personal information of all clients and personnel, including information which may be transferred to a third party;
- Documentation explaining Independent Lifestyles' policies and procedures regarding the protection of personal information is available to clients and the general public;
- Information to explain to personnel the policies and procedures which apply to their own personal information is found in the Personnel Handbook;
- Vanessa Knox is responsible for privacy governance and management;
- All personnel and contractors can recall the name, address and phone number of Vanessa Knox when requested;
- Independent Lifestyles uses contractual agreements to ensure privacy protection is offered to personal information;
- Personnel are trained regarding the protection of personal information by informing them of organizational privacy policies, procedures and best practices during their orientation.

#### **2. Identity purposes: Informing individuals of the purposes for collection**

- Personal information is needed for the Service Agreement, to initiate and undergo an Home Healthcare Assessment, for funding investigations, and to deliver home healthcare services;
- Name and contact details are minimally required in order to initiate a Home Healthcare Assessment;
- Collection of personal information to provide Professional Nursing Services, Personal Care, Companionship, Meal Preparation, Housekeeping, and Transportation Assistance is essential and obligatory. Collection of information to access community services, resources or specialty services are optional and can be opted out;

- Age; name, medical records, physical health and contact details are collected for the purpose of delivering home healthcare services.

### **3. Consent: Obtaining appropriate consent and allowing individuals to withdraw consent**

- Clients are not required to consent to the collection, use or disclosure of personal information beyond what is necessary to fulfill specified home healthcare services;
- Independent Lifestyles considers the sensitivity and intended use of personal information, and the reasonable expectation of clients in determining which form of content we will accept for the collection, use and disclosure of personal information;
- To obtain Professional Nursing Services a client care consent form is signed acknowledging to the collection, use or disclosure of personal information is required to obtain services;
- Consent is obtained so we can undergo a Home Healthcare Assessment, to provide home healthcare services and treatment, and to release records and information for the purpose of care and treatment;
- Clients have the right to withdraw consent at any time, subject to contractual restrictions and reasonable notice;
- Clients and/or Client Representatives are informed of the implications of the withdrawal of consent.

### **4. Limiting Collection:**

- The amount and type of personal information collected by Independent Lifestyles is limited to what is necessary for delivering services as identified in the Service Agreement;
- Specific types of information Independent Lifestyles collects along with the purposes for collection is documented in the client care consent form.

### **5. Limiting Use, Disclosure, and Retention:**

- Independent Lifestyles does not use or disclose information for purposes beyond those for which it was collected, except with the consent of the client or as required by law;
- Client personal information is retained as long as necessary to allow for the fulfillment of Home Healthcare Services;
- Client personal information used to make decisions about a client is retained long enough for the client to request access to their information;
- The destruction of personal information, including the role of contractors performing such activities is governed in the Contracted Work Agreement, Confidentiality and Conflict of Interest Agreement, and Protection of Personal Information Agreement and in the Vendor/Supplier Confidentiality Agreement.

### **6. Accuracy: Ensuring that information is correct, complete, and up-to-date**

- Independent Lifestyles will make a reasonable effort to ensure that personal information collected by or on behalf of us is accurate and complete. All requests for the correction of personal information are forwarded to Vanessa Knox;
- Personnel are required to keep their Personnel file up to date based on the defined purposes and uses of information as listed in the Personnel Handbook;
- Periodic spot-checks are conducted on databases and hard copies of key information to determine it is accurate, complete and up to date.

### **7. Safeguards: Ensuring adequate security measures**

- Independent Lifestyles uses safeguards to protect personal information from theft, modification, unauthorized access, collection, use, disclosure and destruction. Information is retained only as long as reasonable to carry out business or legal purposes. Care is used in disposing of, or destroying, information;
- Hard copies of personal information in our custody or under our control are stored in a secure and locked file cabinet, accessible only by Vanessa Knox;

- Soft copies of personal information is maintained on a personal computer and meets the security and compatibility requirements of provincial and federal law. This includes User Account Controls and strong password protection, Windows Firewall, and up-to-date system protection settings to ensure only authorized users have access to information on computers;
- Third Party Transfers of information require clauses in contracts to ensure that personal information has the same level of protection under PIPEDA as Independent Lifestyles does;
- Independent Lifestyles has procedures for documenting and following up on security breaches and you will be informed if affected.

#### **8. Openness: Making information on policies and practices available**

- You can ask Vanessa Knox or an authorized representative about our privacy policies, practices or procedures in person, in writing, by telephone. Our privacy policy is available on our website at [www.independentlifestyles/about](http://www.independentlifestyles/about);
- Our purpose statements are part of the Service Agreement and the Client Consent Form.

#### **9. Individual access: Receiving and processing access requests**

- You have the right to access, make corrections, and challenge the accuracy of your personal information. All requests for access to personal information are forwarded in writing to Vanessa Knox at no cost within 30 days;
- Time limit extensions only in cases where responding within the original 30 days would unreasonably interfere with Independent Lifestyles' company operations, when additional time is needed to conduct consultations, or when additional time is needed to convert personal information to an alternative format;
- Personnel are advised to direct requests for access to information to Vanessa Knox;
- Disclosure of information to a third party can be provided on receipt of a request for such a list from a client;
- Clients can receive assistance if they need help to complete a request for information;
- Independent Lifestyles will provide access to information in a format which is legible and understandable;
- Requestors will be advised of the reasons for refusal and recourse available to them when refusing to provide information;
- Clients or Personnel can challenge the accuracy of personal information and amend information when that information is proven to be accurate or incomplete;
- Independent Lifestyles will forward correct personal information to third parties who would have received the original information.

#### **10. Challenging Compliance; receiving and responding to inquiries and complaints**

- If you have any concerns regarding a real or potential compromise of your personal information, please contact Vanessa Knox immediately at [vanessak@independentlifestyles.ca](mailto:vanessak@independentlifestyles.ca) or by phone at 604.886.8300;
- Independent Lifestyles has policies and procedures in place for receiving and responding to complaints or inquires about personal information handling policies and practices;
- Clients and personnel have the right to make a complaint to a regulatory body;
- All complaints Independent Lifestyles receives about personal information handling policies and practices is investigated;
- Independent Lifestyles modifies its actions, policies and documents if a complaint is substantiated in order to minimize the likelihood that the issue will reoccur.