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Assisted Living Southwestern Ontario is a not-for-profit charitable organization that is dedicated to providing persons with physical disabilities with services to enhance their independence and opportunities in an environment to promote dignity and personal development. As such, we provide personal support and assisted living services to individuals with physical disabilities by way of Attendant Outreach Services, Assisted Living Services in their homes. In addition, ALSO offers other services that are consistent with that mandate, including crisis intervention and community life skills and acquired brain injury supportive housing programs.

At ALSO, we take privacy very seriously. In addition to our established policy of dealing with personal health and other information in a sensitive manner, we are required by law to ensure that our Collection, use, retention and Disclosure of Personal Information is carried out in accordance with established principles and requirements of Ontario's *Personal Information Protection Act, 2004*, (“*PHIPA*”).

ALSO is required to respect certain minimum standards of conduct that ensure we meet or exceed all legislative requirements in relation to personal and personal health information protection. This Policy will outline these minimum standards.

Scope of Policy

This policy deals with the minimum standards that all employees must respect and the sanctions in the event the minimum standards are not respected.

Article 1 - Employee Compliance

- 1.1 Employees must at all times respect that personal medical information is the most highly sensitive of all personal information.
 - 1.2.1 Only employees who have a “need to know” may access medical records maintained at ALSO. No employees may access medical records unless directly involved in consumer care or the access is specifically authorized in order to perform administrative or other services for the consumer.

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- 1.3 Employees must ensure that they do not speak about a specific identifiable individual and their medical status where other consumers and employees are within earshot.
- 1.4 All employees shall ensure that medical information is not left in a conspicuous location and must be returned to the secure filing cabinet immediately after their use.
- 1.5 In no case should employees leave medical information in plain view after hours when cleaning or other staff may have access to this information.
- 1.6 When transcribing Dictaphone tapes or other medical information, employees are required to erase the information once recorded or place the tapes in the medical records room after hours if the tape is not finished.
- 1.7 In no case may any staff take personal health information outside the Organization (or the consumer home) unless required and a specific protocol is worked out in advance with the Executive Director or Privacy Officer.
- 1.8 The medical information must be secured at all times to ensure that the public does not have access to the records.
- 1.9 Employees who are assigned passwords to software containing personal medical information shall not share that password with other employees.
- 1.10 Note that all staff are required to inform the Privacy Officer if they feel a specific practice may cause personal health information to become compromised.

Sanctions

All employees are required to adhere to this policy and in the event an employee discovers a transgression of this policy, there is an obligation to inform the Privacy Officer promptly as legislation requires ALSO to report to the consumer involved the breach of their privacy rights.

In the event it is determined that an employee has failed to abide by the policy they will be subject to discipline up to and including termination of employment.

Employees may be subject to additional legislative sanctions and a failure to protect personal health information may expose ALSO to liability.

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Modification of Policy

ALSO reserves the right to modify this policy from time to time.