

CSC Privacy & Confidentiality

CSC believes that information gathered during the course of our work – about Clients, Volunteers, Employees, Brokered Workers, Independent Contractors and other stakeholders – is private and every safeguard should be taken to ensure that personal information and personal health information is kept confidential, in keeping with sound, ethical principles, leading practices and governing legislation.

CSC collects, uses, discloses, retains, and protects personal health information (PHI) and is a health information custodian (HIC) under the Ontario Personal Health Information Protection Act, 2004 (PHIPA) and the federal Personal Information Protection & Electronic Documents Act, 2011 (PIPEDA). Under certain circumstances, CSC may also be subject to the Freedom of Information Freedom and Privacy Act, 1990 (FIPPA), which provides the framework within which people may access information from institutions.

Openness and Transparency: This policy is available for public viewing in the waiting rooms of all CSC office locations and posted on our website. It describes how this office collects, protects, and discloses the PHI of Clients and the rights of Clients with respect to his or her PHI. Questions regarding our privacy practices can be answered by contacting CSC's Privacy Officer.

Accountability: CSC collects, uses, and discloses PHI only for the purposes of providing service or the administration of that service or for other purposes expressly consented to by the Client.

Collection, Use and Disclosure of Personal Information: CSC will only collect the information that is required to provide services, administer the service that is provided, and communicate with Clients. CSC will not collect any other information, or allow information to be used for other purposes, without the Client's express consent - except where authorized to do so by law or the presence of risk to self or others. These limits on collection ensure that we do not collect unnecessary information.

Consent: Client consent – implied or expressed – is acquired at intake. Clients have the right to refuse consent to disclose their PHI without being denied services with CSC. Clients have the right to withdraw consent to have their PHI shared with other health providers or third parties at any time.

Safeguards: Safeguards are in place to protect the security of Client information. These safeguards include a combination of physical, technological and administrative measures. Any other persons having access to Client information or to CSC premises shall, through contractual or other means, provide comparable safeguards.

Record Retention: CSC retains Client records as required by law and professional regulations.

Secure Disposal/Destruction of Information: When information (PHI, personal information and other information) is no longer required, it is destroyed or retained as required by law and professional regulations.

Client Rights: Clients have the right to access to their records in a timely manner. In extremely limited circumstances, the Client may be denied access to his or her records, but only if providing access would create a risk to that Client or to another person. For example, the information could reasonably be expected to seriously endanger the mental or physical health or safety of the individual making the request or another person.

Accuracy of Information: CSC makes every effort to ensure that Client information is recorded accurately.

Privacy and Access Complaints: A Client who believes that CSC has not responded to his or her access request or handled his or her PHI in a reasonable manner, is encouraged to address his or her concerns with CSC's Privacy Officer.

Privacy Breach: A breach of confidentiality is defined as the inappropriate collection, access, use or disclosure of PHI. CSC will comply with legislated protocols relating to privacy breaches.

