

## Canadian College of Health Service Executives Privacy Policies and Procedures

### Preamble

CCHSE undertakes to protect personal information it collects in compliance with the federal *Personal Information Protection and Electronic Documents Act*. The following outlines CCHSE's commitment to respect privacy, maintain confidentiality and safeguard personal information. The following principles and policies are based on those in Schedule 1 of the *Act*.

The *Act* defines personal information, as "any information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization". As such "business card" information is excluded from the definition, and is not subject to the rules in the *Act* or these policies.

CCHSE's operating system may automatically record some general information about web-site visits, such as:

- The Internet domain of a Internet service provider, such as "company.com" or "service.ca" and the IP address of the computer accessing the website, such as "ppp-55"
- The type of browser (such as "Netscape version x" or "Internet Explorer version x") used
- The type of operating system used (such as Macintosh, Unix, or Windows)
- The date and time of a visit to our site and the web pages that was visited on our site, along with the address of the previous website visited.
- We use this information for statistical analysis, to help us make our site more useful to visitors. We may disclose this non-personal information to third parties such as sponsors, clients or advertisers and/or use it for auditing purposes. **This tracking system does not record personal information about individuals or link this information to any personal data collected.**

We may use "cookies" that identify a return visitor. A cookie is a piece of data that a website can send to a browser, which may then store the cookie on a hard drive. The goal is to save time and provide members with a more meaningful visit and to measure website activity. Cookies do not contain any personally identifying information.

Policies	Procedures
<b>1. <u>Accountability</u></b>	
1.1 CCHSE's President and Chief Executive Officer is accountable for CCHSE's compliance with the <i>Personal Information Protection and Electronic Documents Act</i> , even though other employees or agents may be delegated to act on behalf of the President and CEO.	When delegating duties and responsibilities under the Act or the CCHSE policies, the President and CEO issues written notification to employees and agents.
1.2 CCHSE uses contractual or other means to provide privacy protection, when personal information collected by CCHSE is being processed by a third party.	When a contractor has access to personal information, collected by CCHSE, for processing or other purposes, the Director, Corporate Affairs or the Chapter Chair ensures the contract has

	<p>provisions addressing the contractor's duty to:</p> <ul style="list-style-type: none"> <li>▪ limit uses and disclosures to purposes allowed by the contract,</li> <li>▪ use physical, organizational and technical safeguards to protect personal information from unauthorized access, use, disclosure or destruction</li> <li>▪ limit access to its employees and agents who have a "need to know",</li> </ul>
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<p>1.3 CCHSE implements privacy policies and practices, including</p> <ul style="list-style-type: none"> <li>(a) implementing procedures to protect personal information;</li> <li>(b) establishing procedures to receive and respond to complaints and inquiries;</li> <li>(c) training and communicating to staff information about CCHSE's policies and practices; and</li> <li>(d) developing information to explain CCHSE's policies and procedures.</li> </ul>	<ul style="list-style-type: none"> <li>(a) See procedures under section 7</li> <li>(b) See procedures under section 10</li> <li>(c) See procedures under section 7</li> <li>(d) See procedures under section 8</li> </ul>
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<b>2. <u>Identifying Purposes</u></b>	
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<p>2.1 CCHSE identifies and documents the purposes for which personal information is collected.</p>	<p>Upon approval by the President and CEO, the employee or agent</p> <ul style="list-style-type: none"> <li>▪ includes the purposes statement in documentation of the program or service, and</li> <li>▪ makes it available upon request.</li> </ul>
<p>2.2 CCHSE communicates the identified purposes to individuals at or before the time of collection. Depending upon the way in which the information is collected, this can be done orally or in writing.</p>	<p>The employee or agent, responsible for each CCHSE program or service that involves personal information, ensures that the approved purposes are communicated to individuals at or before the time of collecting personal information. This may occur by</p> <ul style="list-style-type: none"> <li>a) including a notice on application, registration and order forms, both paper and electronic</li> <li>b) including the purposes in brochures and other materials that describe the program or service</li> <li>c) verbally explaining the purposes when information is collected verbally (e.g., by phone).</li> </ul>

<p>2.3 When personal information is to be used for a new purpose, CCHSE documents the new purpose prior to use. Unless the new purpose is required by law, CCHSE obtains the consent of the individual before information is used for the new purpose.</p>	<p>The employee or agent, responsible for each CCHSE program or service that involves personal information,</p> <ul style="list-style-type: none"> <li>a) ensures any new purpose is documented, approved and communicated by following procedures 2.1 and 2.2.</li> <li>b) obtains consent from individuals to use personal information for the new purpose, unless the new purpose is required by law.</li> </ul>
<p>2.4 CCHSE employees and agents who collect personal information are able to explain the identified purposes.</p>	<p>The employee or agent, responsible for each CCHSE program or service that involves personal information, ensures that those who collect the personal information are able to explain the identified purposes.</p>
<p><b>3. <u>Consent</u></b></p>	
<p>3.1 CCHSE obtains consent for the collection of personal information and its subsequent use or disclosure, at the time of collection or before use for a new purpose.</p>	<p>The employee or agent, responsible for each CCHSE program or service, ensures that implied or express consent is obtained when personal information is collected.</p>
<p>3.2 CCHSE assumes implied consent has been provided when an individual completes and submits an application, registration and order forms when the purposes are on the form or identified in related program documentation provided to the individual.</p> <p>CCHSE makes a reasonable effort to inform individuals of the identified purposes, so that they can understand how their personal information will be used or disclosed.</p> <p>CCHSE does not require an individual to consent to the collection, use, or disclosure of personal information beyond that required to supply a product or service.</p>	<p>The employee or agent, responsible for each CCHSE program or service ensures that application, registration and order forms and/or and related documentation</p> <ul style="list-style-type: none"> <li>▪ include the identified purposes,</li> <li>▪ include a statement that “CCHSE considers there is implied consent to use and disclose the personal information collected for the identified purposes when a completed form is submitted”, and</li> <li>▪ provide “opt-out” boxes that permit an individual to refuse consent for specific purposes, which are not essential for the program or service (for example, appearing in the Members Directory or on the list of conference participants).</li> </ul>
<p>3.3 CCHSE seeks express consent when appropriate, given the reasonable expectations of an individual and the sensitivity of the information.</p>	<p>The employee or agent, responsible for each CCHSE program or service ensures that express consent for the collection, use or disclosure of personal information is obtained from an individual, when:</p> <ul style="list-style-type: none"> <li>a) implied consent would not be reasonable, or</li> <li>b) the information is sensitive.</li> </ul>

<p>3.4 CCHSE does not obtain consent through deception.</p>	<p>No related procedure.</p>
<p>3.5 An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. CCHSE informs the individual of the implications of such withdrawal.</p>	<p>The employee or agent, responsible for each CCHSE program or service ensures that</p> <ul style="list-style-type: none"> <li>a) individuals are advised of the implications of withdrawing consent (for example, if an individual withdraws consent for CCHSE to use the information on his or her application, the application cannot be processed),</li> <li>b) personal information is not used or disclosed when consent has been withdrawn.</li> </ul>
<p><b>4. <u>Limiting Collection</u></b></p>	
<p>4.1 CCHSE only collects personal information necessary to fulfil the identified purposes.</p>	<p>The employee or agent, responsible for each CCHSE program or service reviews application, registration and order forms to ensure that they only collect personal information necessary for the purpose.</p>
<p>4.2 CCHSE specifies the type of personal information collected as part of its information-handling policies and practices.</p>	<p>The employee or agent, responsible for each CCHSE program or service ensures that public information about the programs and services describes the types of personal information collected.</p>
<p>4.3 CCHSE only collects personal information by fair and lawful means.</p>	<ul style="list-style-type: none"> <li>a) An employee or agent, who believes personal information is being collected by unfair or unlawful means, advises the President and CEO.</li> <li>b) The President and CEO investigates and takes corrective action if required.</li> </ul>
<p><b>5. <u>Limiting Use, Disclosure, and Retention</u></b></p>	
<p>5.1 CCHSE does not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law.</p>	<p>The employee or agent, responsible for each CCHSE program or service ensures that personal information is only used or disclosed for the identified purposes, unless</p> <ul style="list-style-type: none"> <li>▪ the individual has consented to another use, or</li> <li>▪ the use is required by law.</li> </ul>

<p>5.2 CCHSE retains personal information as long as necessary for the fulfilment of the purposes it was collected for.</p>	<p>a) Upon approval by the President and CEO, the Director, Corporate Affairs prepares and distributes a retention schedule to all employees and agents for implementation.</p>
<p>5.3 Personal information that is no longer required to fulfil the identified purposes is destroyed, erased, or made anonymous.</p>	<p>a) Upon approval by the President and CEO, the Director, Corporate Affairs prepares and distributes a records disposition procedure to all employees and agents for implementation.</p>
<p><b>6. <u>Accuracy</u></b></p>	
<p>6.1 CCHSE ensures personal information shall be as accurate, complete, and up-to-date as is necessary for the identified purposes.</p>	<p>The employee or agent, responsible for each CCHSE program or service takes reasonable steps to ensure that personal information is accurate, complete and as up-to-date as necessary for the purposes.</p>
<p>6.2 CCHSE routinely updates personal information when necessary to fulfil the purposes for which the information was collected.</p>	<p>a) The Director, Corporate Affairs ensures that members have the opportunity to review and update their personal information for the membership database as part of the annual membership renewal process.  b) For other purposes, the employee or agent, responsible for each CCHSE program or service updates personal information, when needed to carry out the purpose.</p>
<p><b>7. <u>Safeguards</u></b></p>	
<p>7.1 CCHSE has security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.</p> <p>CCHSE's safeguards include:  (a) physical measures, such as restricted access to its offices;  (b) technological measures, such as the use of passwords and firewalls.</p>	<p>The Director, Corporate Affairs is responsible for:  a) protecting personal information in electronic formats against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification, by <ul style="list-style-type: none"> <li>• developing, implementing and monitoring procedures and processes to support the secure collection, access, retention, destruction, storage, transfer and release of personal information,</li> <li>• maintaining disaster recovery plans to ensure the availability of information systems,</li> <li>• responding to security incidents and breaches and taking corrective action to prevent similar breaches in the future,</li> <li>• maintaining up-to-date system control and audit logs.</li> </ul> b) protecting personal information in non-electronic formats against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification, by <ul style="list-style-type: none"> <li>• implementing and monitoring procedures</li> </ul> </p>

<p>7.3 CCHSE makes its staff aware of the importance of maintaining the confidentiality of personal information.</p>	<p>and processes to safeguard personal information from such risks,</p> <ul style="list-style-type: none"> <li>• designating staff who have responsibilities under the procedures, and</li> <li>• reviewing and testing the effectiveness of the safeguards.</li> </ul> <p>c) developing, implementing and monitoring procedures and systems which</p> <ul style="list-style-type: none"> <li>• control access to CCHSE offices,</li> <li>• ensure visitors are screened and supervised,</li> <li>• provide for the secure disposal and destruction of non-electronic records containing personal information, and</li> <li>• other corporate safeguards.</li> </ul> <p>The Director, Corporate Affairs ensures that each new employee:</p> <ul style="list-style-type: none"> <li>• receives a copy of these privacy policies and procedures</li> </ul>
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<b>8. <u>Openness</u></b>	
<p>8.1 CCHSE makes readily available information about its policies and practices relating to the management of personal information, including</p> <ul style="list-style-type: none"> <li>(a) the name or title, and the address, of the President and CEO who is accountable for the CCHSE's policies and practices and to whom complaints or inquiries can be forwarded;</li> <li>(b) the means of gaining access to personal information held by CCHSE;</li> <li>(c) a description of the type of personal information held by CCHSE, including a general account of its use;</li> <li>(d) a copy of any brochures or other information that explain CCHSE's policies, standards, or codes; and</li> <li>(e) what personal information is made available to related organizations.</li> </ul>	<p>The Director, Corporate Affairs ensures that the information listed in this policy is available to the public through appropriate means, such as paper documentation and information on the CCHSE website.</p>
<b>9. <u>Individual Access</u></b>	
<p>9.1 Upon request, CCHSE informs an individual of the existence, use, and disclosure of his or her personal information.</p> <p>9.2 Upon request, CCHSE provides an individual with access to his or her personal information. Exceptions to access may occur when information:</p> <ul style="list-style-type: none"> <li>▪ is prohibitively costly to provide,</li> <li>▪ contains references to other individuals,</li> <li>▪ cannot be disclosed for legal, security, or commercial proprietary reasons, and</li> <li>▪ is subject to solicitor-client or litigation privilege.</li> </ul> <p>Upon request, CCHSE provides the reasons for any denial of access.</p> <p>9.3 CCHSE responds to an individual's access request normally within 30 days and at no cost to the individual.</p>	<p>When an individual</p> <ul style="list-style-type: none"> <li>▪ inquires about the existence, use, and disclosure of his or her personal information, or</li> <li>▪ requests access to his or her personal information,</li> </ul> <p>the Director, Corporate Affairs</p> <ul style="list-style-type: none"> <li>a) coordinates the search for all records that contain the individual's personal information,</li> <li>b) reviews the records to determine if any information will be withheld, and</li> <li>c) responds in writing to the individual within 30 days, to indicate <ul style="list-style-type: none"> <li>▪ whether access will be provided</li> <li>▪ the reasons why access is denied to any of the records</li> <li>▪ that the records are attached (if copies requested) or the process to examine the originals.</li> </ul> </li> </ul>

<p>9.4 An individual is able to challenge the accuracy and completeness of the information.</p> <p>9.5 When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, CCHSE amends the information as required and, if</p> <ul style="list-style-type: none"> <li>a) appropriate, transmits the amended information to third parties to whom it has been disclosed.</li> <li>b) When a challenge is not resolved to the satisfaction of the individual, CCHSE records the substance of the unresolved challenge and when appropriate, transmits the existence of the unresolved challenge to third parties to whom the information in question was disclosed.</li> </ul> <p>9.6 CCHSE responds to an individual's requests normally within 30 days and at no cost to the individual.</p>	<p>When an individual requests amendments to his or her personal information, the employee or agent,</p> <ul style="list-style-type: none"> <li>a) makes the changes when it is reasonable to do so (for example, new address), or</li> <li>b) refers the request to the appropriate employee or agent, who makes the amendments.</li> </ul> <p>When the amendments are of a more substantial nature, the employee receiving the request may ask the individual to submit the request in writing with supporting documentation. In this case, the Director, Corporate Affairs</p> <ul style="list-style-type: none"> <li>a) clarifies the request with the individual,</li> <li>b) reviews the request to determine if amendments are appropriate, and</li> <li>c) responds in writing within 30 days, to indicate <ul style="list-style-type: none"> <li>▪ whether the amendment has been made,</li> <li>▪ the reasons why an amendment has been refused,</li> <li>▪ that a note has been added to the individual's records which described the unresolved dispute, and</li> <li>▪ whether the amendment or statement of dispute will be provided to other parties who have received the original information.</li> </ul> </li> </ul>
<p><b>9. <u>Challenging Compliance</u></b></p>	
<p>10.1 An individual is able to address a challenge concerning CCHSE's compliance with these policies or the <i>Personal Information Protection and Electronic Documents Act</i> to the President and CEO.</p> <p>10.2 CCHSE informs individuals who make inquiries or lodge complaints of the relevant complaint procedures.</p> <p>10.3 CCHSE investigates all complaints. If a complaint is found to be justified, CCHSE takes appropriate measures, including, if necessary, amending its policies and practices.</p>	<ul style="list-style-type: none"> <li>a) When an individual inquires about challenging compliance, the employee or agent provides this procedure.</li> <li>b) An individual may challenge CCHSE's compliance with these policies or the <i>Personal Information Protection and Electronic Documents Act</i> in writing to the President and CEO.</li> <li>c) Following investigation of the challenge, the President and CEO will notify the individual in writing of <ul style="list-style-type: none"> <li>▪ the findings</li> <li>▪ the actions being taken, if any, and</li> <li>▪ the individual's right to appeal to the Privacy Commissioner of Canada.</li> </ul> </li> </ul>