



# Connections Early Years Family Centre

## Privacy and Protection of Personal Health Information Policy Statement for Stakeholders

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### ***Your Privacy Is Important***

**Connections Early Years Family Centre** is committed to ensuring your confidentiality and protecting your privacy and personal health information which is shared with us for the purpose of providing a community service. We manage all of your information in accordance with the **Personal Health Information and Protection Act, 2004** and other applicable laws. This policy document provides general information about our policies and procedures with respect to collecting, using, disclosing and maintaining personal information.

### ***Types of Personal Health Information We Collect***

***Personal health Information*** is a term used to refer to information that can be used to distinguish or identify an individual.

The type of personal health information we collect varies depending upon the nature of your relationship with Connections.

**For staff, board members, volunteers, students, consultants and candidates for employment,** we collect personal information that may include names, addresses, resumes, proof of professional education/registration and criminal reference check information.

**For donors** we collect personal information that may include name and addresses. This information is collected to acknowledge donations and for accounting purposes.

Personal Health Information is collected directly from you except when you give consent to obtain the information from others (e.g. school liaison) or where the law requires or allows us to collect information without consent (e.g. in urgent situations where information is needed to prevent potential harm).

Whether we collect information directly or from third parties, we collect only information that we believe is reasonably necessary for the intended purposes.

## ***Purposes of Collecting, Using and Disclosing Personal Health Information***

We will identify the purposes for which information is being collected before or at the time of collection.

We will collect, use and disclose only as much personal health information is needed to achieve these purposes.

Personal Health Information may be used only for the purposes for which it was collected except with your consent or required by law.

Personal Health Information is required through contractual agreements by the Ministry of Children and Youth, Ministry of Education and the City of Windsor and other funders from time to time.

**For staff, board members, contract and agreement holders, volunteers, students, consultants and candidates for employment,** we collect, use and disclose personal health information for the following purposes:

- To provide Preschool Speech and Language service
- To provide Infant Hearing Program service
- To provide Blind Low Vision Program service
- To provide Ontario Early Years Program service and associated funded programs
- To complete our statistical collection requirements
- To conduct quality improvement and risk management activities
- To teach students and to provide continuing education to our staff

**For donors** we collect personal information for the following purposes:

- To issue charitable tax receipts and acknowledge donations
- To share information regarding upcoming events, activities and services
- For future fundraising

We do not share or disclose personal health information with anyone outside of Connections without obtaining consent from you.

Our processes for obtaining consent for the disclosure of personal health information are in keeping with legal and professional requirements. Obtaining the appropriate consent for the release of information typically includes ensuring your awareness and agreement to:

- The nature of the personal information to be disclosed
- The manner in which the personal information will be disclosed
- The purpose of the disclosure
- The person or body to whom the personal information will be disclosed
- The time frame for which the release of information permission is active

**Exceptions** to typical consent procedures occur only as required or permitted by law and professional and ethical standards:

- In situations of suspected child abuse or neglect
- In situations of imminent harm
- In situations where mandatory reporting by employers to professional regulatory bodies is legislated
- In the context of legal proceedings to comply with a summons or order issued by a person with jurisdiction to compel the disclosure

You can withhold your consent to the collection, use or disclosure of your personal health information and consent will not be implied and your refusal accepted. You have the right to withdraw your consent to the collection, use and disclosure of personal health information at any time unless the collection, use and disclosure is required or permitted by law.

We will fully inform you of the consequences if consent is declined or withdrawn.

## ***Ensuring Accuracy***

Connections will make every effort to ensure the information we collect is accurate, complete and up to date. You have the right to challenge the accuracy of the information. Connections can accept changes to information verbally that would include address and contact information changes. The changes are made upon request and the historical information is maintained. If you wish to challenge the accuracy of personal health information and/or the completeness of records you must put your request in writing via [office@smflc.ca](mailto:office@smflc.ca) or another form of written communication. No part of the original information will be altered or destroyed by Connections until the time of disposal.

## ***Access to Personal Health Information***

Connections will provide access to personal health information to persons who are lawfully entitled to give, withhold or withdraw consent and will give full consideration to requests within a reasonable time frame. Please contact the Privacy Officer at [office@smflc.ca](mailto:office@smflc.ca) for your request.

## ***Safeguards and Security***

Connections personnel are trained in the need for privacy and confidentiality. They are also trained in our centre's privacy and confidentiality policies and procedures, including the prevention of record loss and unauthorized access.

Personal health information may be stored in paper and/or electronic forms. All information is protected by physical and electronic security measures appropriate to the nature of the information, and is accessible only by authorized personnel. In the event that personal health information is stolen, lost or improperly accessed, you will be notified.

## ***Retention and Disposal of Personal Health Information***

Connections will retain your personal health information for as long as necessary for the fulfillment of the purposes listed and/or to comply with legal and contractual requirements. The information will be retained in accordance with our retention policy.

All personal health information will be shredded to protect your identity.

**For volunteers and students** personal health information will be retained for two years after the last date of their involvement at the Centre.

**For donors** personal health information will be retained for seven years.

**For staff, Board members, agreement and contract holders and consultants** personal health information will be retained for five years.

**For candidates for employment** personal health information will be retained for six months.

## ***Policy Review and Amendments***

Connections will review and amend policies and procedures on an on-going basis in order to ensure we are effective and efficient in protecting your personal health information.

## ***Questions or Concerns***

If you have questions or want to make a complaint about how we protect your personal health information please contact our privacy officer:

Karen Johnson  
Connections Early Years Family Centre  
519-252-9696  
[office@smflc.ca](mailto:office@smflc.ca)

You also have the right to complain to the Information and Privacy Commissioner of Ontario at the address below if you have concerns about our privacy practices or how your personal health information has been handled:

Information and Privacy Commissioner/Ontario  
2 Bloor Street East, Suite 1400, Toronto, Ontario M4W 1A8  
1-800-387-0073  
TDD/TYY: 1-416-325-7539  
FAX: 1-416-325-9195  
[www.ipc.on.ca](http://www.ipc.on.ca)