

# PRIVACY

TransCare® P&P: QM 404

Rev: 2014-07-07

Authorized By: *Odette Mahony*

## PURPOSE

The purpose of this policy is to declare how TransCare® collects, stores, and releases personal information it collects. It informs the individual what specific information is collected, and whether it is kept confidential, shared with partners, or sold to other agents.

## SCOPE

All employees and volunteers

## POLICY

TransCare® Community Support Services is strongly committed to protecting the privacy of employees, volunteers and clients. TransCare®'s ongoing commitment to protect the confidentiality, security and accuracy of personal information is addressed in this policy.

### **Personal information in personnel file:**

Personal Information is information that identifies the employee or volunteer and relates specifically to that individual. The personnel file includes personal information such as: home address and telephone number, emergency contact information, information about bank account for payroll purposes for an employee or community worker ("Agency Personnel"), promotional interview notes, performance reviews and medical notes.

For Agency Personnel, the employment file only includes information that is reasonably necessary for the administration of the employment relationship with the Company. For volunteers, the personnel file only includes information that is reasonably necessary for the administration of the volunteer relationship with the Company.

### **Use of information:**

TransCare® only uses the personal information in the personnel file for the purpose of administering the employment or volunteer relationship. For Agency Personnel, this may include the administration of salary, insurance, pension and other similar employment benefits. For volunteers, this may include information such as name, address, contact information and reference information.

### **Collecting personal information for client file:**

Collecting personal information is integral to the ability to properly provide safe, effective and reliable services to clients.

TransCare® will ensure all client personal information will be kept securely and used only as is necessary and authorized.

In recognition of this goal, TransCare® makes the following commitments to the client:

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1. TransCare® will limit the collection, use and disclosure of client personal information to the minimum necessary. Client personal information is used to ensure TransCare® safely and effectively delivers the care required, taking into consideration, for example, any health conditions or diet restrictions the client may have which may affect the type or delivery of services.
2. In effectively providing services to clients, on occasion TransCare® may advise clients, by way of mail and other similar notifications, about medical updates, medical news, fundraising campaign information, available assistive devices, and other notifications that may be required to effectively administer the organization.
3. Any personal information, including medical information, that the Agency collects, will be stored in a safe and secure manner. TransCare® will permit only authorized Agency Personnel, who are trained in the proper handling of client information to have access to client information. TransCare® will not use or share, either internally or externally, any medical information provided by the client, their physician or family member, other than for the purpose of ensuring the client is receiving the appropriate services from the organization.
4. Client personal information, including medical information may be provided to the Agency Personnel, who will then use the information, as necessary, to provide the client with assistance either at the client's home or during the client's attendance at or participation in, one of the Agency's programs.
5. TransCare® will not disclose client information to any other organization, third-party or individual without first informing the client and obtaining their consent to do so, unless otherwise authorized by law.
6. If the Agency ever has cause to retain another organization to help provide assistance to the client, TransCare® will require them to abide by and to implement privacy standards comparable to those of the organization.
7. The goal of the Agency is to keep client information up to date and as accurate as possible. In the event a correction or update should be made to the client's personal information, TransCare® will take all necessary steps to ensure the information is updated as promptly as possible.

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## DEFINITIONS

N/A

## PROCEDURES

### Procedure for Accessing Personal Information

For all employees, volunteers or clients:

To access their file or to find out what information the Agency has about them, the individual must write to:

Odette Maharaj  
TransCare Community Support Services  
1045 McNicoll Avenue  
Toronto, Ontario M1W 3W6

The individual must specify what information they are interested in, whether a correction to their information should be made, and whether they require any copies to be made of documentation.

In the event they require copies to be made of information in their file, the Agency will inform them that they should be aware there may be a nominal fee for providing this service. TransCare® will inform the individual in advance as to the cost of acquiring copies of documentation in their file, and they will then have an opportunity to instruct the Agency to proceed or to withdraw their request.

There may be instances where TransCare® will not be able to provide access to all personal information. Some of these instances include where the document containing the personal information:

1. contains references to the personal information of others that cannot be severed;
2. is subject to a legal privilege;
3. contains TransCare®'s own proprietary information that is confidential to the organization;
4. has already been destroyed due to legal requirements or because TransCare® no longer needed it for the purposes for which it was initially collected; or
5. cannot be disclosed for legal reasons.

If TransCare® is unable to provide the individual with access to their personal information, TransCare® will always explain the reasons why and any recourse they have available.

If the employee, volunteer or client successfully demonstrates that the personal information the Agency has is inaccurate or incomplete, TransCare® will amend the information as required. Where

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appropriate, TransCare® will send the amended information to third parties who have access to the information in question.

## REVISION HISTORY

- 2014-07-07

## RELATED DOCUMENTS

- Employee & Volunteer Privacy Commitment
- Client Privacy Commitment