



Privacy, Consent, Collection & Disclosure of Personal/Health Information 2021 Policy Bulletin

This Policy Bulletin document summarizes Sunbeam Community & Developmental Services (SCDS) current policies regarding compliance with privacy and consent legislation, as well as collection, use and disclosure of personal information, including information related to health. As per ONT REG. 299/10, these Policies are reviewed by Board Members at their Orientation and annually thereafter; with all staff and volunteers during their initial orientation and annually thereafter; with all new clients and their Advocates prior to admission; and with all clients and their Advocates at each Person Centred Planning (PCP) review. Augmentative language tools are utilized to help support communication with clients, as needed.

In addition, the content of this Policy Bulletin is reviewed annually by the Board members and is incorporated in the Board By Laws & Policy Manual. Policies and Policy Bulletins are available on staff portals for review at anytime. Policy Bulletins and relevant policies are posted on the SCDS websites: www.sunbeamcommunity.ca where individuals and families can access them at anytime. In addition, client rights are reviewed with individuals and their Advocates or Guardians at each Person-Centred Planning meeting.

Written Statement of Information Practices

SCDS, and its programs and services, collects and records personal information/personal health information about the people we serve, our employees and volunteers, and our donors. This information is collected from the person directly, or from someone acting on their behalf (an Advocate or Guardian). The personal information that we collect may include:

- Personal name, date of birth, and contact information;
- The names and contact information of family members and significant others;
- Information contained within an Application for Developmental Services and Supports;
- Information that has been shared with SCDS regarding the person supported;
- Information that is provided to SCDS by employees, volunteers, and donors;
- Any other information that might affect the provision of services and supports.

SCDS may also collect and record personal information from other sources if we have obtained consent to do so or if the law permits. Information shared with SCDS may be documented in electronic client records (ECRs), staff/volunteer/donor databases, and paper files and will be stored and retained in accordance to policies related to disposal and destruction of information.

SCDS uses and discloses personal information/personal health information to:

- Allow members of our team to provide services, where requested;
- Make referrals on behalf of the individual supported, as requested;



- Provide support and assistance to the individual supported and their Advocate;
- Plan, administer, and manage our internal operations;
- Maintain information in our ECRs for current services and future planning needs;
- Maintain information in staff databases for employer obligations;
- Support volunteers and donors with their connection to SCDS;
- Conduct risk assessments and complete quality improvement/assurance initiatives;
- Compile statistical analysis of services to conduct research;
- Comply with legal and regulatory requirements; and,
- Fulfill other purposes permitted or required by law.

SCDS takes steps to protect personal information/personal health information from theft, loss, and unauthorized access, copying, modification, use, disclosure, and disposal. Audits are conducted and investigations completed to monitor and manage privacy compliance. SCDS takes steps to ensure that everyone who performs services for us, protect the personal information/personal health information collected and only uses such information for the purposes for which SCDS has been consented to use it or as authorized by law. Various technical and policy measures are in place to protect personal information/personal health information maintained at SCDS.

Individuals and/or their Advocate/Guardian, employees, volunteers and donors may access and correct the content of their personal information/personal health information by contacting the Coordinator, Supervisor or Manager of the associated department.

Consent may be withdrawn from some of the above uses and disclosures of personal information/personal health information by contacting the Coordinator, Supervisor or Manager of the associated department, subject to legal exceptions.

For additional information about SCDS's privacy practices, or to raise a concern that you may have about Privacy, Consent, Collection & Disclosure of Personal/Health Information, please contact us at:

Sunbeam Community & Developmental Services, Privacy Committee
2749 Kingsway Drive
Kitchener, ON N2C 1A7
Phone: (519) 893-6200
Email: privacy@sunbeamcommunity.ca
Website: sunbeamcommunity.ca/feedback



The Information and Privacy Commissioner of Ontario

The Information and Privacy Commissioner of Ontario is responsible for making sure that privacy law is followed in Ontario. For more information about your privacy rights, or if you are unable to resolve an issue directly with our Privacy Contact and wish to make a complaint, contact:

Information and Privacy Commissioner of
Ontario
2 Bloor Street East, Suite 1400
Toronto, ON M4W 1A8

Email: info@ipc.on.ca
Toll Free: 1-800-387-0073
TDD/TTY: 416-325-7539