

Privacy and Security, Data Collection and Records Management Policy

Policy Number	<i>BOH126</i>	Approved Date	<i>February 20, 2019</i>
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REVISION HISTORY

Reviewed		Amended:	June 17, 2026
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Purpose

The Corporation is committed to ensuring access to information under the control the health unit with limited and specific exceptions and to protect the privacy of individuals with respect to personal information about themselves held by institutions providing those individuals with a right of access to that information.

To this end, the Corporation has implemented practices for the collection and management of personal and confidential information received by the Corporation and takes reasonable measures to preserve records in our custody and/or control. These practices apply to all individuals who are employed by the Corporation, volunteer with the Corporation or are members of the board of directors of the Corporation.

Scope

This policy applies to all directors of the Corporation (the “**Directors**”) on the Board.

Regulation

The Board as the head of the Corporation is charged with ensuring transparency and access to information under the control of the Corporation while also protecting the privacy of individuals with respect to personal information about themselves held by the organization. This includes ensuring consistency with all applicable information privacy legislation, including the Municipal Freedom of Information and Protection of Privacy Act, 1991, (MFIPPA) and the Personal *Health Information Privacy Act, 2004 (PHIPA)*.

The Medical Officer of Health as the Health Information Custodian, as defined under the PHIPA , is mandated to oversee privacy practices related to collection, use, disclosure, and retention of personal health information within the Corporation’s custody and/or control, and to take reasonable steps to ensure that all those working on behalf of the Corporation or as agents of the Corporation handle this information in compliance with PHIPA. The Board of Health as Head of the Health Unit delegates the powers and duties under MFIPPA to the Medical Officer of Health and the Health Unit’s Privacy Officer as outlined in agency policy. These privacy legislations provide individuals with the right of access to personal information about themselves, held by the Corporation, subject to limited and specific exceptions.

In addition to reporting any security and data management risks in accordance with the Board’s Risk Management Policy, the Medical Officer of Health shall report annually on security risks and risk mitigation strategies and on information privacy and access statistics

and emerging issues.

The Medical Officer of Health will report to the chair of the Board as soon as reasonably practicable where a privacy breach meets the threshold for reporting to the Information and Privacy Commissioner appointed under the *Freedom of Information and Protection of Privacy Act*. The Board shall hold management accountable to ensure that the collection or use of any personal information shall be in compliance with applicable laws and regulations, including all privacy laws, and the Corporation's policies in effect from time to time on this matter and will take reasonable measures to preserve records in the Boards' custody and/or control.

Amendment

To align with the Ontario Public Health Standards, this policy shall be reviewed and approved by the Board every two years, and may be amended from time to time as the Board deems necessary.

Review/Revision History:

March 20, 2024 – review and revise

June 17, 2026 – updated to include current MFIPPA and PHIPA practices