

PRIVACY POLICY

AUTHORITY: University Administration

RESPONSIBILITY: Provost and Vice-President, Academic

Effective Date: April 1, 2016

PART 1

INTRODUCTORY PROVISIONS

Purpose:

The purpose of the Privacy Policy is to ensure, as far as is reasonable and practicable, that the Collection, Use, Disclosure, retention, disposition, and security of Personal Information (PI) and Personal Health Information (PHI) by the University is done in compliance with requirements under legislation.

Scope:

This Policy applies to all University employees, contractors, volunteers, students, and other persons who may Collect, Use, Disclose, store, or destroy PI or PHI in the course of their association with the University.

Responsibility:

The Provost and Vice-President, Academic, on behalf of University Administration, is responsible for the development, administration, and review of this policy.

Definitions:

“Authorized Person” means: a University employee, contractor, volunteer, student, or other persons who may Collect, access, Use, or Disclose PI or PHI in the course of their association with the University only to the extent that they need to know the information to carry out

- a) the purpose for which the information was Collected or received,
- b) a purpose authorized under FIPPA or PHIA and cited in Table 1 below, or
- c) a Use or Disclosure of that information authorized by the consent of the individual the PI or PHI is about.

Approved: March 29, 2016

Revised:

Cross Reference:

Privacy Procedures

TABLE 1

FIPPA	PHIA
s.43 or 45 (Appendix “A” attached)	s.21 (Appendix “B” attached)
s.44 (Appendix “C” attached)	s.22 (Appendix “D” attached)
s.47 or 48 (Hyperlink)	s.24 (Hyperlink)
s.44.1 (Hyperlink)	s.25 (Hyperlink)

“Collect,” “Collected,” “Collecting,” or “Collection” means: the assembly or accumulation of PI or PHI.

“Disclose,” “Disclosed,” “Disclosing,” or “Disclosure” means: the sharing, providing, exposing, making known, revealing, or otherwise releasing of PI or PHI to any person or entity that is not an Authorized Person.

“FIPPA” means: The Freedom of Information and Protection of Privacy Act C.C.S.M. c. F175 as amended from time to time.

“Health Care” means: any care, service, or procedure provided

- to diagnose, treat, or maintain an individual’s physical or mental condition,
- to prevent disease or injury or promote health, or
- that affects the structure or a function of the body, and includes the sale or dispensing of a drug, device, equipment, or other item pursuant to a prescription.

“Personal Information (‘PI’)” means: Recorded Information about an identifiable individual, including:

- the individual’s name, home address, or home telephone, facsimile, or email,
- the individual’s age, sex, sexual orientation, marital or family status,
- the individual’s ancestry, race, colour, nationality, or national or ethnic origin,
- the individual’s religion or creed, or religious belief, association or activity,
- personal health information about the individual,
- the individual’s blood type, fingerprints, or other hereditary characteristics,
- the individual’s political belief, association, or activity,
- the individual’s education, employment or occupation, or educational, employment, or occupational history,
- the individual’s source of income or financial circumstances, activities, or history,
- the individual’s criminal history, including regulatory offences,
- the individual’s own personal views or opinions, except if they are about another person,
- the views or opinions expressed about the individual by another person, and
- an identifying number, symbol or other particular assigned to the individual.

Approved: March 29, 2016

Revised:

Cross Reference:

Privacy Procedures

“Personal Health Information (‘PHI’)” means: Recorded Information about an identifiable individual that relates to:

- the individual’s health, or Health Care history, including genetic information about the individual,
- the provision of Health Care to the individual,
- payment for Health Care provided to the individual, and includes
- the personal health identification number and any other identifying number, symbol, or particular assigned to an individual, and
- any identifying information about the individual that is collected in the course of, and is incidental to, the provision of Health Care or payment for Health Care.

“PHIA” means: The Personal Health Information Act C.C.S.M. c. P33.5 as amended from time to time.

“Record” or “Recorded Information” means: a record of information in any form, and includes information that is written, photographed, recorded or stored in any manner, on any storage medium or by any means, including by graphic, electronic or mechanical means, but does not include electronic software or any mechanism that procedures records.

“Use,” “Used,” or “Using” means: the accessing, being exposed to, viewing, dealing with or otherwise employing PI or PHI.

PART 2

PRINCIPLES

Principles:

The protection of PI and PHI is of great importance to the University. The University strives to be in compliance with applicable legislation concerning the Collection, Use, Disclosure, retention, disposition, and security of PI and PHI. Accordingly, access to PI and PHI is restricted to only Authorized Persons. The Use and Disclosure of PHI shall only be for purposes authorized by FIPPA or PHIA.

No person shall Collect, Use, or Disclose PI or PHI in the course of their association with the University except in accordance with law and the provisions of this Policy. Failure to comply may result in penalties or disciplinary action being taken up to and including removal from position or office, termination of contract, employment, or association, or commencement of legal action as may be applicable.

PART 3

Approved: March 29, 2016

Revised:

Cross Reference:

Privacy Procedures

REVIEW

Review:

This Policy shall be reviewed at least once every five years or more frequently as required to reflect changes in legislation or to related University policies, procedures, and processes.

Approved: March 29, 2016

Revised:

Cross Reference:

Privacy Procedures