



Unit 24, 30 Clarendon Crescent
London, Ontario, N6C 5Y1
brfs.services@gmail.com
[HTTP://bluewaterrespite.dudaone.com/](http://bluewaterrespite.dudaone.com/)
519.281.4290

Business #703127712

POLICY MANUAL

PERSONAL HEALTH INFORMATION PRIVACY

POLICY

Bluewater Respite Inc. is committed to protecting the confidentiality of the personal health information in its custody and control. Anyone who collects, uses or discloses personal health information on Bluewater Respite Inc. behalf is required to follow these 9 information practices.

1. Accountability for Personal Health Information

Bluewater Respite Inc. is responsible for the personal health information in its custody or control. Bluewater Respite Inc. demonstrates its commitment to privacy and the confidentiality of person health information by:

- Educating Associates on PHIPA, assess the agency's compliance to PHIPA and report their findings to the Respite Coordinators or Owner.
- Implementing policies and procedures to protect personal health information.
- Designating a Privacy Officer to:
 - Receive and respond to complaints
 - Field inquiries on privacy related matters, and
 - Make material on Bluewater Respite Inc. privacy policies and procedures publicly available.
- Educating anyone who collects, uses or discloses personal health information on Bluewater Respites Inc. behalf about their responsibilities under Bluewater Respite Inc. privacy policies.
- Reviewing this Privacy Policy on an annual basis.

2. Identifying Purposes for which Personal Health Information is Being Collected

Bluewater Respite Inc. will identify to the individual from whom it collects personal health information (and explain as necessary) the purposes of the collection.

Bluewater Respite Inc. collects personal health information for purposes related to direct client care, administration and management of Bluewater Respite Inc. services and as permitted or required by law.

When personal health information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified. Unless the new purpose is permitted or required by law, consent is required before the information can be used for that purpose.

3. Consent for Collection, Use, and Disclosure of Personal Health Information

Bluewater Respite Inc. will generally rely on implied consent from our clients or their parent/guardian for the collection, use, or disclosure of Personal Health Information. Where disclosures to third parties are involved, Bluewater Respite Inc. will obtain express consent to collect, use or disclose PHI as required by Bluewater Respite Inc. Policy. Under certain circumstances, Bluewater Respite Inc. may disclose health information as required by law without consent.

4. Limiting Collection of Personal Health Information

Bluewater Respite Inc. limits the amounts and type of personal health information it collects to that which is necessary to fulfill the purposes identified. Information is collected directly from the individual, or parent/guardian, unless the law permits or requires collection from third parties.

5. Limited Use, Disclosure, and Retention of Personal Health Information

Bluewater Respite Inc. uses and disclosed personal health information for purposes related to direct client care, administration and management of Bluewater Respite Inc. programs and services, and as permitted or required by law.

Personal health information will be retained in accordance with Bluewater Respite Inc. practice and as required by law. Otherwise it will be destroyed, erased, or made anonymous.

6. Accuracy of Personal Health Information

To the extent reasonably possible, personal health information will be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used. Bluewater Respite Inc. does not routinely update personal health information, unless this is necessary to fulfill the purposes for which the information was collected.

7. Safeguards for Personal Information

Bluewater Respite Inc. has implemented security safeguards for the personal health information it holds, which include:

- Physical measures (such as locked filing cabinets)
- Organizational measures (such as permitting access on a “need-to-know” basis only), and
- Technological measures (such as the use of passwords).

Bluewater Respite Inc. requires anyone who collects, uses or discloses personal health information on its behalf to be aware of the importance of maintaining the confidentiality of personal health information. This is done through the signing of confidentiality agreements and ongoing privacy education.

Bluewater Respite Inc. has taken steps to ensure that the personal health information in its custody and control is protected against theft, loss and unauthorized use or disclosure.

Care is used in the disposal or destruction of personal health information, to prevent unauthorized parties from gaining access to the information.

8. Openness About Personal Health Information Policies and Practices

Information about Bluewater Respite Inc. policies and practices relating to the management of personal health information is available, including:

- Contact information for the Privacy Officer, to whom complaints or inquiries can be made to Owner – Emanuel Alves / Lisa Alves.
- The process for obtaining access to personal health information held by Bluewater Respite Inc. and making requests for its correction.
- A description of the type of personal health information held by Bluewater Respite Inc. including a general account of its use and disclosures.

9. Challenging Compliance with Bluewater Respite Privacy Policies and Practices

An individual may address a challenge concerning compliance with this policy to the Owners at 519.281.4290.

Bluewater Respite Inc. will receive and respond to complaints or inquiries about its policies and practices related to the handling of personal health information. It will inform individuals who make inquiries or lodge complaints of other available complaint procedures. All complaints will be investigated.

If a complaint is found to be justified, Bluewater Respite Inc. will take appropriate measures.

BREACH OF CLIENT PRIVACY

POLICY

Breach of privacy includes any intentional or inadvertent unauthorized access, use of disclosure of confidential information and any inappropriate disposal of confidential information. Common examples of breaches of confidentiality include, but not limited to:

- The misplacement of a client record
- Any electronic device or thumb drive, with confidential information stored on it, is stolen
- Client information addressed to one person is mailed to the wrong address
- Accessing personal health information of family members or friends without authorization
- Documents containing patient health information are left in a public area
- Disclosure of patient information to a police officer without the persons consent, a warrant or summons.

PROCEDURE

The following steps should be followed in the event a breach occurs:

1. Inform your Respite Coordinator who will inform the Owner who will act as the Privacy Officer.
2. Identify the extent of the breach. For example, if the breach involves unauthorized disclosure of personal health information, determine what information was inappropriately disclosed, to whom the information relates and to whom it was disclosed.
3. Take steps to contain it. For example, if the breach involves unauthorized access to confidential information stored electronically, take steps to suspend the sign-on facilitating the inappropriate access to the application.
4. Ensure that any person not authorized to receive the confidential information did not make or keep copies of the information and get that person's contact information in case you need to follow up.
5. Note down the unauthorized uses and disclosures in or linked to the affected confidential records.
6. If necessary, investigate to determine the cause of the breach.

COMPLIANCE WITH THIS POLICY

It is the obligation of Bluewater Respite Inc. involved in any breach to notify the people whose privacy has been breached. In particular, people whose privacy has been breached should be told specifically what and how much confidential information was affected and what immediate and long-term steps that Bluewater Respite Inc. and others have taken to rectify the breach. The involved Associates should work with the Privacy Office to discharge this obligation.

Every person working at Bluewater Respite Inc. has the right and responsibility to report a breach of privacy without fear of reprisal for doing so. Breaches of privacy can be reported to a Coordinator or directly to the Privacy Officer (Owner).

Individuals who fail to comply with any part of this policy may be subject to discipline up to and including termination of contract.

SECURITY OF CONFIDENTIAL INFORMATION WHEN USING ELECTRONIC EQUIPMENT

PREAMBLE

This policy is intended to identify security implications inherent in using electronic equipment in a confidential environment, and to provide direction to associates in order to ensure security of confidential information.

POLICY

It is the policy of Bluewater Respite Inc., Respite Coordinators and Sub-Contractors that all will take all necessary precautions to protect the confidential nature of client/agency information.

E-Mail and Texting Communication with Clients

1. The use of email/texting as a method of communication with clients is permitted when agreed to by the parties. This form of communication has inherent risks that can be mitigated by following practices.

Clients should be advised that email/text communication will be monitored from 8:00AM to 10:00PM on normal days of operation. Clients should be advised to limit their email/text communication to those times as no monitoring is undertaken outside of those times unless specific arrangements are established between Bluewater Respite and client. In any case communication should not be undertaken past 11:00PM.

Sub-Contractors who receive urgent or crisis messages by email/text should determine if the message constitutes a serious risk to the client or others. If such a risk appears to be present notify coordinator.

2. When using email/texting, recommend to the client that they password protect their email/phone account to avoid unauthorized access to the communication. The best use of email/texting with clients is to communicate arrangements (appointment times, etc.) Limit therapeutic counsel to a client via email to responses or follow-up

to previously identified concerns raised during face to face contact. Clients should be discouraged from sending any attachments or photos with their email/texting communication to Bluewater Respite Inc. Avoid using client full names in an email or text communication. If this proves impractical use first name with last initial. A test email/text to the client must be used to ensure the address is correct. When sending clients email, check the “confirm reading” setting checkbox appearing below the subject line of the email window. This will notify you that the message has been received and read.

Phones

Use of cellular phones in conducting business, including texting is permitted. Upon becoming aware that any cell phone used for communication has been lost or misplaced, advise your coordinator immediately. Communicating with clients via text requires security procedures in order to ensure the security of confidential information. Associates using cellphone for Bluewater Respite use will ensure the phone is passcode protected. Client contacts must be saved by first name and last initial only. Client information must be deleted daily.

Fax Machines

1. The use of fax machines to transmit confidential information is discouraged. However, in the event the time lines necessitate its use, phone or email the intended user to advise them the fax is about to be sent and request they monitor its arrival and confirm they are prepared to receive the document. Ensure that the display of the fax number called matches the number keyed, monitor the transmission of the document until its finished, attached the fax output slip to the transmitted material and place in the client file.
2. When sending a fax, always include a cover sheet showing to and from contact information, emails and phone numbers.

Electronic Recording of Clients

1. Any technology used to record clients shall be treated with the same security as client files.

2. Recordings containing dated client information shall be erased when no longer need.

Flash Drives

1. All flash drives used for processing client information are to be labeled as such and erased following the transfer to hard drives or network storage.
2. All drives used to back up hard drive storage should be treated with the same security measures as client files.

Students, Volunteers and Unpaid Trainees

It is hereby understood and agreed to that any student, volunteer or unpaid trainee, while under the direct supervision of the NAMED INSURED, will be covered by Bluewater Respite Inc's independent contractor insurance with Beazley Canada Limited per;

- Policy No. 12900790 Section III- Definitions E

This amendment to the insurance policy will have an effective date starting November 11, 2019 and will be on going until further notice.

Laptop Computers, IPADS, Tablets, Cell Phones

1. When using portable or home computers to process client data, staff are not to save files to their hard drive. Use flash drives under the guidelines appearing above.

Name: _____

Signature: _____

Date: _____

Witness: _____