

SECTION 2 – BOARD POLICIES 2.16 PRIVACY

Purpose

To set out the privacy policy and provide guidelines for its implementation.

Policy

Individual files are legal documents and as such, Sage shall comply with all privacy legislation that pertains to the administration of its programs at any given time.

Documentation in a client file may include:

- Services, resources offered, referrals made.
- Progress made and identified with the client around the case plan.
- Observations, changes in behavior and concerns identified by staff.
- Diagnostic information when made by a registered health professional.

File documentation will not include judgmental comments.

Whenever a commercial activity is undertaken, Sage shall follow government legislation protecting consumer/donor rights as defined by the Personal Information Protection Act. (PIPA).

Sage shall comply with Canada's anti-spam legislation (CASL) when communicating electronically (e.g., by email).

Names of persons gathered shall be used only for the purpose that was originally intended. Clients/members/donors shall be given the opportunity to agree or disagree to having their names used for anything other than the original intent.

Sage will not rent or sell donor information lists, or any other type of client information.

Related operational privacy policies:

- 10.1 Information Handling and Security
- 10.2 Information Management Roles and Responsibilities
- 10.3 Alberta Electronic Health Record
- 10.4 Collection Use and Disclosure of Health Information

- 10.5 Patient Client Information Transmission
- 10.6 Information Sharing with Protective and Emergency Services
- 10.7 Right of Access to Personal Information
- 10.8 Disclosure of Personal Health and Social Information
- 10.9 Research from Patient-Client Records
- 10.10 Research with Voluntary Participants
- 10.11 Information Sharing with Service Providers
- 10.12 Transitory Records
- 10.13 Security Breaches
- 10.14 Privacy Breach Notification

Confidentiality

All staff, volunteers, and Directors shall sign a Confidentiality Agreement while working with Sage and shall follow the terms of Policy 7.4.6 Confidentiality and Release of Information and Policy 8.3.3 Volunteer Confidentiality and Release of Information.

Complaints

Complaints from individuals who are not satisfied with Sage's privacy policies and controls should first follow Sage's Complaints procedure detailed in policy 3.29 Complaints. Should their privacy concern not be addressed through this procedure, they should be referred to:

Office of the Information and Privacy Commissioner of Alberta
410, 9925 104 St
Edmonton, AB T5J 2J8
Phone: (780) 422-6860
Fax: (780) 422-5682