



Toronto College[™]
of Dental Hygiene and Auxiliaries^{Inc.}

Privacy Policy

Privacy Officer Job Description and Privacy Policy

TCDHA Privacy Policy

Privacy Officer for Toronto College of Dental Hygiene and Auxiliaries Inc. (TCDHA)

**Dr. Boris Pulec
28 Vanley Crescent
Toronto, Ontario
M3J 2B8**

**T: 416.423.3099
F: 416.423.3092**

Privacy Officer Duties and Responsibilities:

- Ensure the organization complies with the Personal Information Protection and Electronic Documents Act (PIPEDA);
- Respond to requests for access to and correction of personal information and general issues concerning personal information,
- Work with the Information and Privacy Commissioner during the investigation of a privacy complaint against the organization;
- Oversee information-management practices, policies, and procedures with regard to personal information;
- Oversee staff training with regard to personal information;
- Oversee customer relations with regard to personal information;
- Oversee policies and procedures with regard to personal information;
- Oversee inquiry and complaint processes.
- Ensure everyone follows the TCDHA **General Rules (i to ix)**.

General Rules:

i) **Company Awareness:**

Everyone at the TCDHA who handles personal information should have a general understanding of the protection of privacy principles and the objectives of the ***Personal Information Protection and Electronic Documents Act (PIPEDA)***. This will be available for review at the front desk, and clinic reception and in the faculty staff room. The Privacy Officer will provide assistance when a more detailed understanding of the organization's responsibilities is required.

ii) **Third-Party Contractors:**

The TCDHA may from time-to-time use contractors or third parties to perform services that involve personal information. All such individuals or companies need to sign the **Third-Party Contractor Privacy Form (Section 3)**.

iii) **Complaint Process:**

If there is a complaint made against TCDHA or any of its employees, the Privacy Officer is to follow the TCDHA **Complaint Handling Process (Section 2)** and use the **Privacy Complaint Form (Section 2A)**.

iv) **Client Files:**

All clients seen at the dental clinic need to read, understand, and sign the **Confidentiality Agreement Form (Section 4)**, found in the client chart. All active client files are to be locked and stored in the clinic chart room area and inactive files in the lodestar chart room and only individuals who need them for educational purposes or those who are involved with client treatment can access these files.

v) **Student Files:**

All student files are kept under lock and key in the office of the Dean. The files may only be accessed by individuals requiring this information to perform their duties.

vi) **Verbal Communication:**

All verbal communication that involves personal information should be done discreetly so other individuals cannot overhear the information. If there are sensitive or personal issues to be discussed they are to be done in a private area, such as an administration office, or board room.

vii) Communication With Parents or Representatives:

No information is to be given to anyone in any format, including but not limited to verbal, written, electronic without written authorization by the individual the information involves. When an individual asks to speak with anyone or requests information about anyone at the TCDHA, including staff, faculty member, student, client, they must first produce a signed letter from that staff or faculty member, student, client giving TCDHA permission to disseminate personal information to the individual. Students must fill out and sign the, **Permission to Discuss Issues Form (Section 5)**.

viii) Client Record Transfer:

Only clients can request their records be transferred to another individual or institution. Before any records are transferred the client needs to sign a **Transfer of Records Form (Section 6)**.

ix) Evaluation and Mark Postings:

All grades and evaluations are to be kept in a secure location allowing access to only the faculty and staff that require this information to perform their duties. The grades are not to be discussed with anyone outside the TCDHA. All grades are posted under a secret code. If students suspect that others are aware of their secret code they may request a change.

Section 2

TCDHA Privacy Complaint Process

The [*Personal Information Protection Electronic Documents Act \(PIPEDA\)*](#) requires organizations to have a process in place that individuals can use to make complaints about the organization's compliance with the Act. As well, PIPEDA permits the Information and Privacy Commissioner to refer an individual's complaint against an organization back to the organization if he is not satisfied that the individual attempted to first resolve the complaint with the organization.

TCDHA's goal is to:

- address complaint in a timely manner;
- identify and address systemic or ongoing compliance problems;
- increase consumer confidence in privacy procedures;
- demonstrate commitment to privacy and build the institution's reputation.

Process

Complaint should be submitted to:

Privacy Officer

**Dr. Boris Pulec
28 Vanley Crescent
Toronto, Ontario
M3J 2B8**

T: 416.423.3099

F: 416-423-3092

Complaint must be submitted in writing:

The complainant must fill out the **Privacy Complaint Form. (Section 2A).**

Staff Responsibilities:

When a privacy complaint is received by the organization or any staff member, it should immediately be forwarded to the Privacy Officer.

Staff, upon request, should be able to inform an individual about how to submit a complaint to the institution. A complainant should also be informed of the right to complain to the **Information and Privacy Commissioner** if he or she is not satisfied with the institution's response to the complaint.

If any TCDHA staff or faculty member receives a written complaint, he or she should record the date of receipt on the form and inform the individual that the complaint will be sent to the Privacy Officer, who will notify them when they have received it.

Privacy Officer Responsibilities:

When the complaint is received by the Privacy Officer, he or she will record the date of receipt on the complaint form.

The Privacy Officer acknowledges the receipt of the complaint to the complainant as soon as possible in writing.

The Privacy Officer contacts the individual to clarify the complaint, if necessary.

The Privacy Officer investigates all complaints received.

The Privacy Officer notifies the owners of the TCDHA of any written complaint. A meeting will be held to ensure the complaint process is fair, impartial, and confidential. The complaint investigation will be assigned to a person with the skills necessary to conduct a fairly and impartial review.

TCDHA will give the investigator access to all relevant records, employees, or others who handled the personal information.

If the complaint is justified, TCDHA will take appropriate measures to rectify the situation, including correcting information-handling practices and policies where necessary and communicating those changes to relevant staff.

The Privacy Officer will notify individuals of the investigation findings clearly and promptly, informing them of any relevant actions or outcomes.

The Privacy Officer must record all decisions to ensure consistency in applying the Act.

The Privacy Officer will verify that any required changes to policies, procedures, or practices have been instituted.

A file containing all relevant information and outcomes will be stored in the Dean's Office and locked in the file room.