



Privacy Policy

Policy Rehabilitation Network Canada Inc. (hereinafter, “RNC”, “we”, “us”, “our”) is committed to protecting the privacy of our clients, customers and employees. RNC’s policies and practices are in keeping with standards of confidentiality, the Personal Information Protection and Electronics Document Act (PIPEDA), Personal Health Information Protection Act (PHIPA) and the Freedom of Information and Protection of Privacy Act (FIPPA). Furthermore, RNC’s Privacy Policy is based upon the Canadian Standards Association’s Model Code for the Protection of Personal Information.

This Privacy Policy will explain how we collect, use, disclose and protect personal information when utilizing our website or accessing our programs and services. RNC has outlined in this Privacy Policy, what information may be collected, how we use this information and under what circumstances we may disclose the information to third parties.

By utilizing our site and or services, and supplying your personal information, you have acknowledged that you have read and understood this Privacy Policy and are in agreement with and give consent.

Every RNC employee and subcontractor is responsible for the consistent application of our privacy practices. Employees also adhere to their relevant credentialing body’s code of ethics, which outlines principles for the ethical handling of personal information. These may include the Vocational Rehabilitation Association of Canada Code of Ethics, the College of Vocational Rehabilitation Professionals Code of Ethics, the CRCC Code of Professional Ethics for Rehabilitation Counselors, etc.

If at any time, you have questions or want to learn more about how RNC manages and protects your personal information, you may contact our Privacy Officer by sending an email to info@rehabnetwork.ca.

Personal Information Collected

Personal information is defined as any information related to an individual that can identify them. This includes information such as name, address, date of birth, telephone number, social insurance number, etc.

Accountability

RNC understands the importance of ensuring personal information we collect directly or receive from other sources in the course of business activity remains confidential and protected. A Privacy Officer has been designated to oversee our approach to privacy and to ensure compliance with our practices. This includes tracking data and responding to inquiries related to

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our internal privacy practices, assessing the effectiveness of the procedures we have in place, and ensuring we remain consistent with our privacy practices and current with changes to applicable legislation and the information technology environment. RNC's accountability of privacy also extends to information that is transferred to third parties. In these cases, contractual obligations and requirements are followed to ensure we are providing a consistent standard of privacy protection for information that is being accessed by a third party.

Identifying Purposes of Collecting Information

RNC collects, uses and discloses personal information in order to provide an individual with our services. We do so in line with legal and regulatory requirements. We will also only use the information collected for the purposes intended. RNC will always inform individuals prior to collecting any personal information and the reason for doing so. We ensure our staff clearly explain the purpose of why they must do so and how the information will be utilized. Any forms used to collect personal information will note a description of the purpose for collection. Further, RNC will inform at the time of collection if personal information will be shared with other parties outside of RNC.

Reasons for collecting your personal information include purposes such as the following: client intake; access participant needs; determine program eligibility; complete and submit job applications; employer outreach; complete formal assessments; respond to inquiries, etc.

Consent

RNC will ensure informed consent is secured for the collection, use and disclosure of personal information. We will ensure all individuals are fully aware and understand the purpose for which we are securing the information. It is further noted that consent made be provided in different capacities, based on the situation and complexity of the information being obtained. Verbal consent may be provided for the securing of basic personal information not shared outside of RNC and would be recorded on file as being received in this manner. Written Consent concerning detailed personal information and information that will be shared with third parties will be obtained via signature on a formal consent form. Informed consent is renewed yearly with clients, and or in incidences where disclosure details change. Individuals are informed that they may withdraw their informed consent at any time, and the implications of same, for their understanding prior to providing their consent.

Limiting Collection of Personal Information Obtained

RNC will only collect information that is necessary for the purposes identified and communicated to individuals being serviced. We will ensure we are clear about the reasons for collecting personal information requested and both our hard and soft copy forms will only gather information that is necessary. We will aim to collect all information from the client directly, but on occasion, personal information may be collected from other sources with prior consent.

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Limiting Use, Disclosure and Retention

RNC will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained for as long as we will need it to fulfill the purposes for which it was collected, inclusive of requirements laid out within our contractual agreements or by law. This practice applies to both electronic and hard copy (paper) records. Following such, RNC will securely destroy these records to safeguard the personal information collected within one year.

If we intend to use personal information for a purpose other than originally identified at the time of collection, RNC will first obtain and document consent for the new purpose, as previously noted. Personal information received by RNC may be shared with other RNC employees for the purposes of facilitating services. Only employees who need to access this information to perform their role will do so. RNC will not disclose personal information to any party outside of RNC unless we are authorized via informed consent to do so. To further safeguard personal information, RNC uses non-identifiable data that does not directly identify a client whenever possible.

RNC understands that there are certain exceptions that consent be obtained prior to disclosure. Same may include when complying with requirements under the law; when a government body requests information to enforce the law; when we have reasonable grounds to believe the information relates to illegal activity; or in an emergency that threatens the life, health and security of an individual.

Accuracy

RNC takes the necessary steps to ensure that client information is recorded accurately and in a complete and up to date manner, as needed for the purposes that it is to be used. We intend to eliminate the use of inaccurate information in making service recommendations or decisions.

Safeguards

Personal information shall be protected by RNC security safeguards appropriate to the sensitivity of the information from unauthorized access, disclosure, use or tampering. RNC has in place procedures and policies to protect personal information. It is the responsibility of all RNC employees to be familiar with these methods and ensure they are following same so that personal information is safeguarded at all times.

All RNC employees, subcontractors and students must sign a confidentiality agreement binding them to safeguarding personal information which they have access to. All relevant privacy practices and policies in place to safeguard personal information is reviewed at time of hire or placement commencement; training is also refreshed annually. Privacy inspections are completed quarterly, with feedback being shared with RNC staff. Ongoing monitoring of the following is completed as well: updates required to our policies; staff knowledge; review and

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documentation of any privacy breaches or complaints that may have taken place; best practices identified, and feedback from internal and external sources.

Physical safeguards are also in place to ensure documents are not accessible in public areas and are maintained in locked cabinets. RNC ensures clients accessing our services have the ability to utilize separate computers, printers and fax machines to those utilized by staff for privacy purposes. RNC facilities also have electronic security protection equipment installed and a door locking procedure.

Finally, RNC has in place technological safeguards to protect our electronic information and technology and ensure our computer security is maintained. These relevant IT policies can be found in Section 9 of the RNC Policies and Procedures Guide. They further detail the security levels in place with respect to submission of information through our website; internal and external emails; and sharing of data via our secure data transfer portal. It is to be noted that with respect to sharing of data electronically, use of password protection and non-identifying coding is also utilized.

Openness

RNC makes information about our privacy practices readily available to individuals for their knowledge and understanding. Our Privacy Policy information is available online on our website, and it is also publicly posted in each RNC office location. Further, the use of our consent form explains the reasons why we are collecting and utilizing the personal data being secured from our clients.

Individual Access

Upon written request and with reasonable notice, RNC will inform a client of the existence, use and disclosure of their personal information in our possession and will be provided access to that information as requested and deemed appropriate. RNC will verify the identity of the person making the request before providing the information.

It should be noted that we may not be able to provide a client access to their personal information if it cannot be separated from the personal information of others, cannot be disclosed for reasons of security or business confidentiality, or is protected by contractual, legal or regulatory requirements. If we are unable to provide client access, we will advise of the reasons, unless we are prohibited by law from doing so.

RNC will respond to requests within a reasonable amount of time, at minimal or no cost to the client. A client also has the right to challenge the accuracy and completeness of the information and have it amended as appropriate.

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Challenging Compliance

A client or employee of RNC may challenge our compliance with these principles by contacting the Privacy Officer and following our formal complaint process as required. All formal privacy-related complaints are addressed and investigated by RNC's Privacy Officer in conjunction with Management. Should it be determined that a complaint is justified, RNC will take the appropriate measures, including addressing and updating our internal policies and procedures.

Changes to our Privacy Policy

RNC reserves the right to update or replace this Privacy Policy at our sole discretion at any time. We will post the most current version on our site and in our offices with a revision date. Your continued use of our services or access of our site after such changes constitutes your acceptance of the revised Privacy Policy. Should significant changes be made to our privacy policy and or consent forms, RNC will inform the individual directly and an updated signed informed consent will be requested.

Questions

If you have any questions, concerns or feedback about this privacy notice, how we manage personal information, and our privacy practices in general, please contact our Privacy Officer, who may be reached at: info@rehabnetwork.ca or 416-297-9373, ext. 221. Further information on privacy and your rights in regards to your personal information may be found on the website of the Privacy Commissioner of Canada