



Privacy Policy and Procedures for Agency Staff Working at Client Sites

Policy Statement: At 911 Nurses GTA, we are committed to safeguarding the privacy and confidentiality of personal information in accordance with applicable privacy laws, guidelines, and the Personal Information Protection and Electronic Documents Act (PIPEDA). This Privacy Policy outlines the policies and procedures that agency staff must follow when working at client sites to ensure the protection of personal information, in compliance with Canadian laws and regulations, including provincial privacy laws such as the Ontario Personal Health Information Protection Act (PHIPA) and Alberta's Health Information Act (HIA).

Applicable Privacy Laws

Federal Laws

- **Personal Information Protection and Electronic Documents Act (PIPEDA):** Applies to the collection, use, and disclosure of personal information in the course of commercial activities across Canada, unless overridden by provincial law.

Provincial and Territorial Laws

- **Alberta:**
 - **Health Information Act (HIA):** Governs the collection, use, and disclosure of health information.
 - **Personal Information Protection Act (PIPA):** Regulates private sector organizations' handling of personal information.
- **British Columbia:**
 - **Personal Information Protection Act (PIPA):** Applies to private sector organizations handling personal information.
 - **Freedom of Information and Protection of Privacy Act (FOIPPA):** Covers public bodies and contractors working with them.
- **Manitoba:**
 - **Personal Health Information Act (PHIA):** Protects personal health information in Manitoba.
 - **Freedom of Information and Protection of Privacy Act (FIPPA):** Governs public bodies.
- **New Brunswick:**



- **Personal Health Information Privacy and Access Act (PHIPAA):** Protects the confidentiality of health information.
- **Newfoundland and Labrador:**
 - **Personal Health Information Act (PHIA):** Governs the handling of personal health information.
- **Nova Scotia:**
 - **Personal Health Information Act (PHIA):** Provides guidelines for handling personal health information.
- **Ontario:**
 - **Personal Health Information Protection Act (PHIPA):** Protects patient health information and governs healthcare providers.
- **Prince Edward Island:**
 - **Health Information Act (HIA):** Provides standards for health information.
- **Quebec:**
 - **Act Respecting the Protection of Personal Information in the Private Sector:** Regulates the private sector.
 - **Act Respecting Health Services and Social Services:** Includes health information regulations.
- **Saskatchewan:**
 - **Health Information Protection Act (HIPA):** Protects health information.
- **Northwest Territories:**
 - **Health Information Act (HIA):** Protects health information.
 - **Access to Information and Protection of Privacy Act (ATIPPA):** Applies to public bodies.
- **Nunavut:**
 - **Access to Information and Protection of Privacy Act (ATIPPA):** Governs public bodies.
 - **Health Information Act (HIA):** Ensures health information privacy.
- **Yukon:**



- **Health Information Privacy and Management Act (HIPMA):** Protects health information.
- **Access to Information and Protection of Privacy Act (ATIPPA):** Governs public bodies.

1. Purpose and Scope:

- a. This Privacy Policy applies to all agency staff of 911 Nurses GTA who handle personal information during their work at client sites on behalf of the agency.
- b. The policy governs the collection, use, disclosure, retention, and disposal of personal information in compliance with PIPEDA, provincial privacy laws, and other applicable Canadian regulations.

2. Confidentiality Obligations:

- a. Agency staff shall treat all personal information obtained during their work at client sites as confidential and shall not disclose, use, or access such information for any purposes other than fulfilling their work duties on behalf of 911 Nurses GTA.
- b. Personal information shall be used solely for the purpose of providing healthcare services as directed by the agency and in compliance with client instructions.

3. Collection and Use of Personal Information:

- a. Agency staff shall collect personal information only as necessary for the provision of healthcare services and in accordance with 911 Nurses GTA's instructions and client policies.
- b. Personal information collected shall be used solely for the purpose of fulfilling staffing requirements and providing quality healthcare services.

4. Security and Safeguards:

- a. Agency staff shall take appropriate measures to protect personal information from unauthorized access, use, disclosure, alteration, or destruction, in accordance with agency policies, PIPEDA, and provincial regulations such as PHIPA and HIA.
- b. Any security incidents or breaches involving personal information shall be promptly reported



to 911 Nurses GTA's designated Privacy Officer and the client, following established reporting procedures.

5. Compliance with PIPEDA and Provincial Privacy Laws:

- a. Agency staff shall comply with the principles outlined in PIPEDA, including the collection, use, disclosure, retention, and disposal of personal information.
 - b. Staff shall adhere to additional privacy requirements as specified by provincial laws such as PHIPA, HIA, and other relevant legislation.
 - c. Staff shall respect individuals' rights to access their personal information, request corrections, and lodge privacy-related complaints, in accordance with PIPEDA and provincial provisions.
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6. Retention and Disposal:

- a. Agency staff shall retain personal information only for the duration required to fulfill the purpose for which it was collected, as directed by 911 Nurses GTA and the client, and in compliance with PIPEDA and applicable provincial laws.
 - b. Upon completion of their work at the client site or termination of their engagement with 911 Nurses GTA, staff shall ensure the secure disposal or return of any personal information in their possession, following agency policies and client instructions.
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7. Training and Awareness:

- a. Agency staff shall participate in privacy and security training provided by 911 Nurses GTA and/or the client to enhance their understanding of privacy obligations, best practices, and procedures, including PIPEDA and provincial laws.
 - b. Staff shall stay updated on changes to privacy laws, guidelines, and policies relevant to their work, including amendments to PIPEDA and provincial privacy regulations.
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8. Reporting and Non-Disclosure:

- a. Agency staff shall promptly report any privacy breaches, incidents, or concerns to 911 Nurses GTA's designated Privacy Officer.
- b. Staff shall not disclose any personal information obtained during their work at client sites to unauthorized individuals or third parties, unless required by law or authorized by 911 Nurses GTA or the client.



Communication Policy: Staff Notifications and Mass Communications

Policy Statement

At 911 Nurses GTA, we are committed to maintaining clear, effective, and timely communication with our staff members. To ensure all staff are informed about assignment opportunities, special offers, and essential updates, we utilize multiple communication methods, including telephone, email, and text messaging. By providing their contact information, staff consent to receiving these communications. However, staff retain the right to opt out of non-essential communications at any time.

Purpose

This policy outlines how 911 Nurses GTA uses staff contact information to communicate and provides guidance on opting out of non-essential communications while ensuring compliance with applicable privacy laws.

Scope

This policy applies to all staff members of 911 Nurses GTA who have provided their contact information (phone number and/or email address).

Communication Methods

1. Telephone Calls:

- Used for urgent notifications, updates about assignments, or important workplace information.
- Calls will be kept professional and relevant to work-related matters.

2. Email:

- Used to send detailed information about assignments, training opportunities, policy updates, and special offers.
- Emails may also include mass communications related to agency-wide announcements.

3. Text Messaging (SMS/MMS):



- Used for quick updates, shift opportunities, special promotions, or urgent reminders.
- Mass text messages may be sent for assignment opportunities or agency offers.

Consent to Communication

- a. By providing their phone number and email address, staff consent to receiving communications via these methods.
- b. 911 Nurses GTA may use mass communication tools to efficiently distribute information about assignment opportunities and special offers.
- c. Contact information will be used solely for the purposes outlined in this policy and in compliance with applicable privacy laws, including the **Personal Information Protection and Electronic Documents Act (PIPEDA)**.

Opting Out of Communications

- a. Staff may choose to opt out of non-essential communications (e.g., promotional messages, mass notifications) at any time by responding with the phrase: **“STOP MESSAGING ME”** to any communication received.
- b. Once an opt-out request is received:
 - Staff will be removed from non-essential communication lists within a reasonable timeframe (typically 5 business days).
 - Essential work-related notifications (e.g., shift confirmations, policy updates) will continue to be sent as needed.

Data Privacy and Security

- a. Staff contact information will be stored securely and used only for approved communication purposes.
- b. 911 Nurses GTA will not share staff contact information with third parties without consent, unless required by law.

Compliance and Accountability



- a. This policy aligns with Canadian privacy laws, including PIPEDA, to ensure that staff privacy is respected.
 - b. Any staff member experiencing issues with communications or wishing to confirm their opt-out status may contact **911 Nurses GTA's Privacy Officer**.
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Policy Review

This policy will be reviewed annually to ensure compliance with evolving communication technologies, privacy laws, and the needs of staff