



<b>TYPE</b>	Operational
<b>NAME</b>	Personal Information Privacy Policy
<b>DATE APPROVED BY COUNCIL</b>	December 9, 2022
<b>DATE REVISED BY COUNCIL</b>	

## OBJECTIVE

The collection, use, and disclosure of personal information in the course of carrying out regulatory activities is done for the purpose of regulating the profession of Denturism in the public interest.

The College of Denturists of Ontario (the College) can collect, and third parties can provide, personal information to the College without the consent of the individual(s) involved, including that of patients. The College also uses and sometimes discloses such information in order to meet its statutory mandate under the *Regulated Health Professions Act, 1991* (RHPA), and the *Denturism Act, 1991*.

This policy transparently informs how the College handles such information.

## THE POLICY

In the course of fulfilling its mandate, the College may collect, use and disclose the personal information of potential candidates, candidates, applicants, registrants, patients and persons employed, retained, elected, or appointed for the purpose of the administration of any legislation related to the governance of the College.

The privacy principles outlined by the *Personal Information Protection and Electronic Documents Act, 2000* provide the framework for the College's privacy policy:

**Principle 1 – Accountability:** The College has identified an Information Officer who will receive questions, complaints and/or comments about personal information. The College's policies regarding privacy and personal information management will be made public and available.

**Principle 2 – Identifying Purposes:** The College collects personal information in order to fulfill its regulatory mandate, and in particular, for the following purposes:

- a) Assessing conformance to entry-to-practice competencies

- b) Assessing eligibility for registration, membership renewal, or reinstatement
- c) Responding to requests for examination accommodation
- d) Assessing Members' continued competence through its Quality Assurance Program
- e) Enforcing standards of practice and conduct
- f) Assessing the risk to the public when alerted that there is a concern about a Member's practice or conduct
- g) Responding to requests or inquiries from or providing information to prospects, applicants, Members, employers, and the public
- h) Verifying identity in order to process requests for access to personal information; i) Carrying out the College's operations, including selecting Members for appointment to the College's committees and contacting potential volunteers and focus group participants
- i) Supporting all activities of Council and Committee Members regarding Council and Committee related matters
- j) Conducting research and compiling aggregate statistics for reporting purposes; and
- k) As required by law or regulation.

Upon request, College Staff will explain the purposes for which the personal information is collected or refer the individual to a designated representative of the College who can explain the purposes.

The College does not use or disclose personal information that has been collected for any new purpose that has not been identified in Principle 2, without first identifying and documenting the new purpose and obtaining consent.

Members should also visit eHealth Ontario's website to review their Notice of Collection and privacy practices.

**Principle 3 – Consent:** Personal information is collected, used, and disclosed with the knowledge and consent of the individual unless it would be contrary to the mandate of the College.

**Principle 4 – Limiting Collection:** The College limits the collection of personal information that is required for the purposes identified in Principle 2.

**Principle 5 – Limiting Use, Disclosure or Retention:** The College does not use or disclose personal information for purposes other than the purposes identified in Principle 2 or as required by law.

The College has a Records and Information Governance policy in place and conducts regular audits to ensure that personal information that is no longer required to be kept is destroyed, eliminated, or made anonymous. The Records and Information Governance policy can be found publicly on the College's website.

**Principle 6 – Accuracy:** The College exercises its best efforts to ensure that the information it collects, uses and discloses is accurate. The College makes corrections to information without removing original entries for accountability.

**Principle 7 – Safeguards:** The College protects personal information with appropriate security safeguards proportionate to the sensitivity of the personal information. Security measures, include restricting access to personal information to authorized personnel, ensuring that physical files are under lock and key and ensuring that electronic files are password protected. The College reviews its security measures periodically with 3<sup>rd</sup> party IT providers to ensure that personal information is secure.

**Principle 8 – Openness:** The College’s confidentiality and privacy policies are available on the College’s website or may be requested by phone or mail. Inquiries concerning the College’s policies and practices for collecting, using, and disclosing personal information may be directed to the Information Officer.

**Principle 9 – Individual Access:** Individuals may submit written requests to the Information Officer to access their information. Access may be denied or refused if the information is impractical or impossible to retrieve, or if releasing it could interfere with the administration or enforcement of the legislation.

**Principle 10 – Challenging Compliance:** Complaints or questions regarding the College's compliance with this policy should be directed to the Information Officer.

### Information Officer’s Contact Information

Attention: Information Officer

Telephone: (416) 925-6331

Email: [info@denturists-cdo.com](mailto:info@denturists-cdo.com)

Mail: 365 Bloor Street East, Suite 1606, Toronto, Ontario, M4W 3L4

### RELATED LEGISLATION AND DOCUMENTS

*Regulated Health Professions Act, 1991*

*Denturism Act, 1991*

*Personal Health Information Protection Act, 2004*

*Personal Information Protection and Electronic Documents Act, 2000*

### REVISION CONTROL

Date	Revision	Effective