

**CANADIAN HEALTH SERVICES RESEARCH FOUNDATION
 GOVERNANCE POLICIES**

Subject:	Privacy and Access to Information	Policy No.:	GP-
Category:	Corporate Services	Approved:	2008
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Reviewed by:	Senior Management	Next Review:	

**PRIVACY AND ACCESS TO INFORMATION
 POLICY**

BACKGROUND

The Canadian Health Services Research Foundation (CHSRF) promotes an open and transparent approach to communications with a focus on information sharing while respecting the privacy of its applicants and its partners. Although CHSRF is not subject to the federal *Access to Information Act*, the *Privacy Act*, or the *Personal Information Protection and Electronics Document Act*, it operates in a transparent manner while respecting the principles of freedom of information and protection of privacy.

PRIVACY

In connection with its funding activities, the CHSRF collects personal information about individuals involved in the applications that it considers and the awards that it funds. The CHSRF also collects personal information about other individuals with whom it communicates in the course of delivering its programs and activities. This policy outlines the access and privacy principles to which the CHSRF adheres and describes how the CHSRF uses and discloses personal information.

PRINCIPLES

The CHSRF access and privacy provisions are based on the following principles, which are drawn from the Canadian Standards Association’s *Model Code for the Protection of Personal Information*, recognized as a national standard in 1996.

1. **Accountability:** The CHSRF is responsible for personal information under its control and has designated the Vice President, Corporate Services accountable for the CHSRF’s compliance with its principles.
2. **Identifying Purposes:** The purposes for which personal information is collected will be identified at or before the time the information is collected.
3. **Consent:** The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except when appropriate.

4. **Limiting Collection:** The collection of personal information by the CHSRF will be limited to that which is necessary for the purposes identified. Information will be collected by fair and lawful means.
5. **Limiting Use, Disclosure, and Retention:** Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information will be retained only as long as deemed necessary for fulfillment of those purposes.
6. **Accuracy:** Personal information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
7. **Safeguards:** Personal information will be protected by security safeguards appropriate to the sensitivity of the information.
8. **Openness:** The CHSRF will make readily available to individuals information about its policies and practices relating to the management of personal information.
9. **Individual Access:** Upon request, an individual will be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. An individual will be able to request a correction of factual inaccuracies.
10. **Challenging Compliance:** An individual will be able to address a challenge concerning compliance with the above principles to the Vice President, Corporate Services.

Collection, Use and Disclosure of Personal Information

1) In program delivery

The CHSRF requires its applicants to provide certain personal information about themselves and their team members involved with the application for which funding is sought. Such information includes, but is not limited to, curriculum vitae, contact information, academic affiliation, and area of work. Moreover, the CHSRF solicits comments from reviewers and committees for the review of applications, which may include comments respecting the suitability, expertise and qualifications of the project participants either individually or collectively.

The CHSRF uses personal information provided in connection with applications to review such applications, to administer, monitor awards and to promote applied health services and nursing research in Canada. As part of the review process, application information is disclosed to independent reviewers drawn from the academic, private and public sectors. All of these individuals are informed of the CHSRF's obligations to protect such information and agree to comply with such obligations in the *Conflict of Interest, Confidentiality and Non-Disclosure Policy* (see <http://www.chsrf.ca>).

The CHSRF may publish or otherwise disclose in its corporate communications including press releases and on its web site, information on approved funding and reports respecting ongoing awards for which funding has been approved. The purpose of these communications is to publicize awards that are funded by CHSRF. Such disclosure/publication may include names, titles, and affiliations of award holders, team members and funding partners, and with their specific consent, comments provided by them, with attribution for communications purposes.

Information contained in applications may be disclosed to potential third party funding partners or funding agencies, for purposes of application review and for project administration.

The CHSRF may use information provided to it in connection with funding applications to identify prospective reviewers.

The CHSRF also uses personal information provided in applications for purposes of internal management, administration and evaluation requirements. In this regard, the CHSRF may use and disclose personal information for program planning, evaluation and review, in audits, and for generating statistics for these activities. Personal information provided to contractors and consultants in the context of these activities is subject to the *Conflict of Interest, Confidentiality and Non-Disclosure Policy* (see <http://www.chsrf.ca>).

The CHSRF routinely publishes and disseminates certain information about successful applications. Such information may include information about team leads and team members including name, institution, department affiliations and field of work or research.

2) *Non-program delivery*

The CHSRF also collects limited personal information through its web site and electronic mail related to persons who express interest in receiving the CHSRF newsletter, news releases, email bulletins, as well as from persons attending CHSRF-sponsored events such as workshops, seminars and related events. CHSRF also collects limited personal information from individuals who make requests to CHSRF for information. Personal information collected in these activities is used only for the purpose that it is collected and is not used or disclosed for any other purpose. CHSRF, in support of its communities' privacy, does not release its mailing lists, in whole or in part, to any organization regardless of their affiliation with CHSRF.

Consent for Use and Disclosure of Personal Information

The CHSRF requires applicants to obtain the consent of all team members' personal information in applications for the use of review of applications and for project administration, as described above. If disclosures are needed for joint review purposes from an integral part of a joint-funding program which has been clearly described to applicants and team members in the CHSRF program information, the above consent will include consent of project participants to such disclosure. If disclosure for a joint review was not anticipated and has not been so described, the organization will seek the express consent of participants to such disclosure. Consents given in connection with program delivery (applications, etc.) may not be withdrawn. Consents to participation in non-program delivery activities such as mailing lists may be amended or withdrawn at any time (see below).

Information Retention

The CHSRF retains information obtained in connection with applications for a period sufficient for completion of its purposes related to an application including administration, reporting, assessment and audit.

Keeping Personal Information Accurate

The CHSRF will correct any factual inaccuracies in personal information held once satisfactory evidence is provided by the individual to whom it relates, or by an applicant with the knowledge and consent of the individual to whom it relates.

Protecting Information

The CHSRF uses appropriate security measures to protect against loss, theft, or unauthorized access, disclosure, use or modification of personal information collected by it. Such measures involve physical, organizational and electronic security procedures and systems. The CHSRF requires that its employees keep all personal information confidential and comply with its personal information security standards

through its Code of Conduct and its human resources policies. The CHSRF requires third parties who are provided with personal information, including its independent reviewers and members of committees and its contractors to keep such information confidential, to use it only for the specific purpose for which it was provided, and to manage and protect it at all times in accordance with standards established by CHSRF.

The CHSRF takes appropriate measures to ensure that upon disposal and destruction of records, confidentiality of personal information is maintained.

Access to Personal Information

Any individual whose information has been collected and is held by the CHSRF may request access to that information. Upon request, the CHSRF will advise individuals of the existence, use and disclosure of their personal information on file with the CHSRF. There will be no cost for reasonable requests to access information unless the individual requests copies of records, makes multiple requests, or the request involves significant retrieval costs. The CHSRF will not respond to requests for access to personal information that are frivolous, vexatious or repetitious.

In certain circumstances, the CHSRF may be unable to provide access to some or all of the personal information that it holds about an individual. Such circumstances include, for example, those in which personal information about the individual cannot reasonably be separated from personal information of others, or cannot be disclosed for reasons related to personal security, solicitor-client privilege or confidentiality.

Requests for Access; Questions, Concerns; Withdrawal of Consent

Individuals may request access to their information, address any questions or concerns regarding their personal information or change or withdraw their consent to the CHSRF's use of their information, in accordance with this policy, by contacting the Vice President, Corporate Services at CHSRF:

by mail to: Canadian Health Services Research Foundation (CHSRF)
1565 Carling Avenue, Suite 700
Ottawa, Ontario
K1Z 8R1
CANADA

Attn: Vice President, Corporate Services

by telephone: 613-728-2238

by email: privacy@chsr.ca

ACCESS TO NON-PERSONAL INFORMATION

In addition to providing access to personal information held by it, the CHSRF will respond to requests for non-personal information provided to it by the applied health services and nursing research community and the general public. Such requests will be processed in accordance with the principles of the *Access to Information Act* to the extent applicable to the CHSRF. Requests for information should be made by contacting the relevant CHSRF program or corporate section directly in the first instance. Where disclosure of the information may be withheld for privacy or other reasons, CHSRF program staff will refer the request to the Vice President, Corporate Services.

CANADIAN HEALTH SERVICES RESEARCH FOUNDATION (“CHSRF”)

**COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION – TEAM LEADS
AND TEAM MEMBERS – APPLICATIONS**

In connection with an application to the CHSRF by [Name of Team Lead] for funding for the [Descriptive title of application], the team lead proposes to collect and provide to the CHSRF certain personal information (including name, department affiliation, curriculum vitae, area of work, expertise, etc.) relating to the team lead and the team members of the application.

The team lead has obtained the consent of the team members designated in the application to the collection, use and disclosure of their personal information, as described in the CHSRF’s *Privacy and Access to Information Policy*.

This information will be used by the CHSRF primarily for reviewing applications, administering and monitoring awards. It may also be used and disclosed, in whole or in part as appropriate, for the following related purposes:

- ❖ consultations, if necessary, with pertinent funding agencies and partners for the purposes of the review/funding;
- ❖ identifying prospective expert reviewers and committee members;
- ❖ administering and monitoring awards;
- ❖ program planning, evaluation and audits,
- ❖ statistical studies conducted by CHSRF on the funding of the research and training in Canada;
- ❖ publicity purposes with the specific consent of the individual; and
- ❖ sharing information with agreed upon potential third party funding partners and funding agencies.

For a more complete description of the uses, disclosures, and management practices related to personal information by the CHSRF, please see the full text of the CHSRF’s *Privacy and Access to Information Policy* document at see <http://www.chsrf.ca>.

The project leader and/or institution has provided a copy of the CHSRF’s *Privacy and Access to Information Policy* to the members of the research team designated in the project funding application.

Name of Team Lead

Name of Witness

Signature

Signature

Date

Date

Protected when completed.

FOR REFERENCE ONLY

CANADIAN HEALTH SERVICES RESEARCH FOUNDATION (“CHSRF”)

INDIVIDUAL PERSONAL INFORMATION CONSENT – TEAM LEADS AND TEAM MEMBERS – APPLICATION FOR CHSRF FUNDING FOR USE WITH THE CURRICULUM VITAE

In submitting the curriculum vitae to the Canadian Health Services Research Foundation (CHSRF), I accept responsibility for the accuracy of all the information entered. I understand that personal information provided to the CHSRF will be safeguarded. It will be used and disclosed in accordance with the CHSRF’s *Privacy and Access to Information Policy* which is based on the principles in the Canadian Standards Association’s *Model Code for the Protection of Personal Information*.

I also understand that my personal information will be used by the CHSRF primarily for reviewing applications, administering and monitoring awards, and that it may also be used and disclosed, in whole or in part as appropriate, for the following related purposes:

- ❖ consultations, if necessary, with pertinent funding agencies and partners for the purposes of the review/funding;
- ❖ identifying prospective expert reviewers and committee members;
- ❖ administering and monitoring awards;
- ❖ program planning, evaluation and audits,
- ❖ statistical studies conducted by CHSRF on the funding of the research and training in Canada;
- ❖ publicity purposes with the specific consent of the individual; and
- ❖ sharing information with agreed upon potential third party funding partners and funding agencies.

I have read the full text of the CHSRF’s *Privacy and Access to Information Policy* document (see <http://www.chsrf.ca>) which contains a more complete description of the uses and disclosures of personal information by the CHSRF and its information management practices and I consent to the uses and disclosures of my personal information by the CHSRF as described in that policy.

I agree.

I disagree.

Name of authorized representative

Name of Witness

Signature

Signature

Date

Date

Protected when completed.