



POLICY TITLE	POLICY NUMBER
Disclosure of Personal Health Information to Affiliated Foundations	GA-7-47
	DATE OF ORIGINAL APPROVAL
	August 6, 2013
MANUAL/SECTION	DATE OF REVIEW / REVISION
General Administration Section 7-Health Information	
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1.0 PURPOSE:

- 1.1 To ensure that the privacy of an individual's name and mailing address is protected during disclosure for the purpose of fundraising to foundations affiliated with trustees and as set out under *The Personal Health Information Act* (hereafter called PHIA).
- 1.2 To detail the conditions and restrictions on the ability of hospitals and personal care homes to disclose information to affiliated foundations.

2.0 POLICY:

- 2.1 Hospitals and personal care homes may only disclose an individual's name and mailing address to a charitable fundraising foundation affiliated with the health care facility.
- 2.2 All disclosures of names and mailing addresses to the affiliated foundation shall be coordinated with the site privacy officer.
- 2.3 Hospitals may disclose the names and mailing address of an individual who has been a hospital inpatient or individuals who are not a hospital inpatient who are or have received services from the hospital, except in the following circumstances:
- The individual has objected to the disclosure of their names and mailing address to the foundation.
 - The individual has died while in the hospital; or
 - The individual is under the age of 18 (for the purpose of this policy only).

2.4 Personal care homes may disclose the name and mailing address of an individual who is or has been a resident of the personal care home, except in the following circumstances:

- The individual has objected to the disclosure of their name and mailing address to the foundation; or
- The individual has died while in the personal care home.

2.5 Notice must be provided to individuals, advising that their names and mailing addresses may be provided to the fundraising foundation affiliated with the facility.

2.6 Individuals must be given a reasonable opportunity to object to the disclosure of their information.

2.7 If an individual objects to the disclosure of their information, their name and mailing address shall not be disclosed to the foundation.

2.8 When an individual objects to the disclosure of their name and mailing address to the foundation, the person receiving the objection shall notify the site privacy officer.

2.9 Hospitals and personal care homes shall enter into a written agreement with an affiliated foundation acknowledging that the foundation agrees to protect the information against such risks as unauthorized access, use, disclosure, or destruction.

3.0 PROCEDURE:

3.1 Disclosure to a Foundation Affiliated with a Hospital

- 3.1.1 Names and mailing addresses of individuals with the exception of those listed in 2.3, will be provided to the foundation on a quarterly basis. For example, names and mailing addresses of individuals who are or have received services in the first quarter (April to June) will be provided to the foundation at the end of the following quarter (September).

3.2 Disclosure to a Foundation Affiliated with a Personal Care Home

- 3.2.1 Names and mailing addresses of individuals with the exception of those listed in 2.4, who have been admitted to a personal care home, will be provided to foundations on a quarterly basis. For example, names and mailing addresses of residents of a personal care home in the first quarter (April to June) will be provided to the foundation at the end of the following quarter (September).

3.3 The processes to disclose the information to a foundation may be customized by each facility.

3.4 The site privacy officer who has been advised of an individual's objection will ensure the information is withheld from the foundation.

4.0 REFERENCES:

4.1 *Personal Health Information (PHIA) Definition Document*

4.2 *The Personal Health Information Act (PHIA)*

4.3 *The Personal Health Information Regulations 245/97, Registered Dec. 11, 1997*

4.4 *WRHA Policy Disclosure of Personal Health Information to Affiliated Foundations*
10.40.145