

**CANADIAN FOUNDATION FOR HEALTHCARE IMPROVEMENT  
GOVERNANCE POLICIES**

<b>Subject:</b> Privacy Policy	<b>Policy No.:</b> GP-C8
<b>Category:</b> Ethics and Accountability	<b>Approved:</b> January 1, 2008
<b>Authority:</b> President	<b>Last Amended:</b> September 1, 2019
<b>Reviewed by:</b> President	<b>Next Review:</b> September 1, 2021

Preamble

The Canadian Foundation for Healthcare Improvement (CFHI) is incorporated as a not-for-profit corporation under federal legislation, and its directors are responsible for managing and supervising the activities and affairs of the Corporation. In discharging this mandate, the Board must comply with the Foundation's governing documents<sup>1</sup> as well as the rules established under the common law governing directors' duties. In addition, and in accordance with By-law Number 1 of the Corporation, the Board of Directors has appointed a president who has general charge of CFHI's business affairs, is responsible for the overall day--to-day management of CFHI and has such authority as prescribed by the Board.

Accordingly, CFHI has developed a policy on privacy.

1. Policy

The CFHI collects personal information about individuals with whom it communicates in the course of delivering its programs and activities. In addition, the CFHI collects personal information about individuals involved in the applications that it considers for the programs it funds. This policy outlines the privacy principles to which the CFHI adheres to and describes how the CFHI collects, uses and discloses personal information.

Personal information means any information about an identifiable individual.

2. Principles

2.1 **Accountability:** The CFHI is responsible for personal information under its control and has designated the Vice-President, Corporate Services accountable for CFHI's compliance with its principles.

2.2 **Identifying Purposes:** The purposes for which personal information is collected will be identified at or before the time the information is collected.

2.3 **Consent:** The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except when appropriate.

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<sup>1</sup>The Foundation's governing documents include the legislation under which CFHI exists and operates, its constating documents (articles of continuance and by-laws), funding/contribution agreements, and internal governance policies.

- 2.4 **Limiting Collection:** The collection of personal information by the CFHI will be limited to that which is necessary for the purposes identified. Information will be collected by fair and lawful means.
- 2.5 **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.
- 2.6 **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.
- 2.7 **Safeguards:** Personal information will be protected by security safeguards appropriate to the sensitivity of the information.
- 2.8 **Openness:** The CFHI will make information about its policies and practices relating to the management of personal information readily available.
- 2.9 **Individual Access:** Upon request, individuals will be informed of the existence, use and disclosure of their personal information under the control of CFHI and will be given access to that information. An individual will be able to request a correction of factual inaccuracies or a withdrawal of consent for the use of such personal information. ([Request for Access](#))
- 2.10 **Challenging Compliance:** An individual will be able to address a challenge concerning compliance with the above principles to the Vice-President, Corporate Services. ([Request for Access](#))

### 3. Collection, Use and Disclosure of Personal Information

#### 3.1 *Program Delivery*

- 3.1.1 The CFHI requires its partners, program applicants and other agents of the organization to provide certain personal information about themselves and their team members involved with the project, program, award or application for which funding and/or other support is sought. Such information may include, but is not limited to, curriculum vitae, contact information, academic affiliation, and area of work. Moreover, the CFHI solicits comments from reviewers and committees for review of applications, commissioned reports and other similar type of products which may include comments respecting the suitability, expertise and qualifications of the project participants either individually or collectively.

The CFHI uses personal information provided in connection with program applications to review such applications, to administer and monitor awards

and to promote healthcare improvement in Canada. As part of the review process, application information may be disclosed to independent reviewers drawn from the healthcare improvement sector including academic, private and public sectors. All of these individuals are informed of the CFHI's obligations to protect such information and agree to comply with such obligations in the *Conflict of Interest Policy* and in the *Conflict of Interest Disclosure Agreement*. (see <http://www.cfhi-fcass.ca>).

- 3.1.2 The CFHI may publish or otherwise disclose in its communications including press releases and on its web site, personal information relating to approved projects, funding and/or other supports, reports for which funding and/or other support has been approved, as well as programs, partnerships, projects, program applications, and events. The purpose of these communications is to share information about the projects, awards, and/or reports that are supported by CFHI and/or to promote healthcare improvement. Such disclosure/publication may include but is not limited to personal information relating to team leads, team members, authors, award holders, and funding partners, including but not limited to name, title, institution, affiliations (where applicable) and field of work. With their specific consent, where permitted or required by law, or where the information is already available through other means, CFHI may also disclose comments provided by them, with attribution. If specific consent has not been obtained for disclosure of comments in advance, identifiable information is only disclosed with specific consent after consultation with the Vice-President, Corporate Services or if the information is already publicly available through other means.
- 3.1.3 Except as noted above or as required by law, information contained in memoranda of understanding, purchase of service contracts, program applications, or job applications will only be disclosed in de-identified form (e.g. for statistical purposes) or, in the case of program information, to potential funding partners or funding agencies for the purposes of program or project administration.
- 3.1.4 The CFHI may use information provided to it in connection with program applications and commissioned reports to identify potential reviewers or enable participation in healthcare improvement initiatives.
- 3.1.5 The CFHI also uses personal information provided in memoranda of understanding, program applications and commissioned reports for purposes of internal management, administration and evaluation requirements. In this regard, the CFHI 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 Policy* and to the *Conflict of Interest Disclosure*

*Agreement* (see <http://www.cfhi-fcass.ca>).

### 3.2 *Non-Program Delivery*

The CFHI also collects limited personal information:

- Through its web site and through social media for analytics and advertising tracking purposes;
- Directly or via a third-party service provider when individuals express interest in receiving the CFHI newsletter, news releases, email bulletins, or similar services and provide their contact information for that purpose;
- From persons attending CFHI-sponsored events such as workshops, seminars and related events; and
- When individuals make requests to CFHI for information.

CFHI only uses this personal information for the purpose(s) that it is collected, with consent, or where permitted or required by law and does not otherwise share its mailing lists or any associated personal information, in whole or in part, with any organization regardless of their affiliation with CFHI. The *Website Privacy Policy* provides further detail regarding the collection of data in these areas (see <http://www.cfhi-fcass.ca>).

## 4. Consent for Use and Disclosure of Personal Information

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

## 5. Information Retention

- 5.1 The CFHI retains information obtained in connection with program applications, job applications, responses to any *Request for Proposal (RFP)*, commissioned research, joint funding of programs and/or projects and similar activities for a period sufficient for completion of its purposes including administration, reporting, assessment, quality assurance and audit.

## 6. Keeping Personal Information Accurate

- 6.1 The CFHI will correct any factual inaccuracies in personal information under the control of CFHI once satisfactory evidence is provided by the individual to whom it relates, or by a program applicant, a partner or co-funder with the knowledge and consent of the individual to whom it relates.

## 7. Protecting Information

- 7.1 The CFHI 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 CFHI requires that its employees keep all personal information confidential and comply with its personal information security standards through its *Code of Conduct Policy* (see <http://www.cfhi-fcass.ca>) and its human resources policies. The CFHI requires third parties who are provided with personal information, including its independent reviewers and members of committees, its contractors and consultants, its partners, etc. 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 CFHI.

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

## 8. Access to Personal Information

- 8.1 Any individual whose information has been collected and is held by the CFHI and is under the control of the CFHI may request access to that information. Upon request, the CFHI will advise individuals of the existence, use and disclosure of their personal information on file with the CFHI and under the control of the CFHI. 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 CFHI will not respond to requests for access to personal information that are frivolous, vexatious or repetitious. If the request for access involves information that is under the control of another organization with whom CFHI partners, CFHI will direct the individual to the other organization. ([Request for Access](#))

- 8.2 In certain circumstances, the CFHI may be unable to provide access to some or all of the personal information that it holds about an individual. Such circumstances may 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. As noted above, if another organization with whom CFHI partners has control over the personal information, CFHI will direct the

requestor to that organization.

9. Requests for Access; Questions, Concerns; Withdrawal of Consent

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

By mail to: Canadian Foundation for Healthcare Improvement (CFHI)  
150 Kent Street, Suite 200  
Ottawa, Ontario  
K1P 0E4  
CANADA  
Attn: Vice-President, Corporate Services

By telephone: 613-728-2238

By email: [privacy@cfhi-fcass.ca](mailto:privacy@cfhi-fcass.ca)