



INFORMATION ACCESS AND PROTECTION OF PRIVACY POLICY

Approved: January 14, 2009

Approved by: Board of Directors
Responsible Office(s): Risk Management Unit
Responsible Officer(s): Dean / Chief Executive Officer
Associate Dean, Administration
Manager, Procurement and Risk
Management

1.0 Overview

As an institution under the *Ontario Freedom of Information and Protection of Privacy Act* (the Act) the Northern Ontario School of Medicine (NOSM) has a responsibility to protect the public interest and has a commitment to the highest standards of institutional integrity, transparency and accountability.

The NOSM is governed by the *Ontario Freedom of Information and Protection of Privacy Act* (the Act) and *Regulations* and other provincial and federal privacy legislation including the *Ontario Personal Health Information Protection Act* and the *Federal Personal Information Protection and Electronic Documents Act*.

In compliance with these responsibilities and legislative requirements, the NOSM will:

- Honour the right of individuals to access any records in the custody or under the control of the School including a record containing personal information about themselves subject to specific limited exceptions as established by the *Act*.
- Protect personal information, as defined in the *Act*, by making reasonable security arrangements against such risks as unauthorized collection, access, use, disclosure or destruction.

2.0 Purpose

To ensure that the NOSM, through its various units collects, uses, discloses, protects, disposes, and, where appropriate, preserves information gathered and generated in the course of operating School programs and activities in a manner that is consistent with the *Ontario Freedom of Information and Protection of Privacy Act and Regulations*, other pertinent provincial and federal privacy legislation and its records management and archival policies.

To facilitate access, routine disclosure and active dissemination of recorded information of the NOSM in accordance with legislation and School policies, guidelines and procedures.

3.0 Policy

It is the policy of the NOSM to provide access to recorded information that is in its custody or under its control subject to specific exclusions and exemptions, and subject to the protection of personal privacy of individuals in a manner that is compliant with the *Ontario Freedom of Information and Protection of Privacy Act*

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and Regulations, other provincial and federal privacy legislation, and School policies.

In applying FIPPA, including addressing issues of custody or control, NOSM will consider the customary practices of university governance and operations, including those set out in NOSM's constituting documents, and collective agreement.

The "Dean" of the NOSM, as appointed Chief Executive Officer by the Board of Directors, is the designated "Head" of NOSM under the Act and may delegate to named officers the authority to act under the *Ontario Freedom of Information and Protection of Privacy Act and Regulations*.

4.0 Related Policies/References

- FIPPA Delegation of Authority Protocol
- Collection of Personal Information Protocol
- The *Freedom of Information and Protection of Privacy Act*
Disposal of Personal Information - R.R.O. 1990, Reg. 459
General - R.R.O. 1990, Reg. 460