



Vancouver CollegeTM

of Dental Hygiene^{Inc.}

The Privacy Officer for Vancouver College of Dental Hygiene Inc. (VCDH).

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Privacy Officer Duties and Responsibilities:

- Ensure the organization complies with the *Personal Information Protection Act* (PIPA);
- Respond to requests for access to and correction of personal information and general issues concerning personal information,
- Work with the Information and Privacy Commissioner during the investigation of a privacy complaint against the organization;
- Oversee information-management practices, policies, and procedures with regard to personal information;
- Oversee staff training with regard to personal information;
- Oversee customer relations with regard to personal information;
- Oversee policies and procedures with regard to personal information;
- Oversee inquiry and complaint processes.
- Ensure everyone follows the VCDH **General Rules (i to ix)**.

General Rules:

i) Company Awareness:

Everyone at the VCDH who handles personal information should have a general understanding of the protection of privacy principles and the objectives of the *Personal Information Protection Act* (PIPA). This will be available for review at the front desk and in the staff room. The Privacy Officer will provide assistance when a more detailed understanding of the organization's responsibilities is required.

ii) Third-Party Contractors:

The VCDH may from time-to-time use contractors or third parties to perform services that involve personal information. All such individuals or companies need to sign the **Third-Party Contractor Privacy Form**.

iii) Complaint Process:

If there is a complaint made against VCDH or any of its employees, the Privacy Officer is to follow the **VCDH Complaint Handling Process** and use the **Privacy Complaint Form**.

iv) Client Files:

All clients seen at the dental clinic need to read, understand, and sign the **Confidentiality Agreement Form** (found in the client chart). All client files are to be locked and stored in the dispensary area and only individuals who need them for educational purposes or those who are involved with client treatment can access these files.

v) Student Files:

All student files are kept under lock and key in the office of the dean. The files may only be accessed by individuals requiring this information to perform their duties.

vi) Verbal Communication:

All verbal communication that involves personal information should be done discreetly so other individuals cannot overhear the information. If there are sensitive or personal issues to be discussed they are to be done in a private area, such as an administration office, or board room.

vii) Communication With Parents or Representatives:

No information is to be given to anyone in any format, including but not limited to verbal, written, electronic without written authorization by the individual the information involves. When an individual asks to speak with anyone or requests information about anyone at the VCDH, including staff, faculty member, student, client, they must first produce a signed letter from that staff or faculty member, student, client giving VCDH permission to disseminate personal information to the individual. Students must fill out and sign the, **Permission to Discuss Issues Form**.

viii) Client Record Transfer:

Only clients can request their records be transferred to another individual or institution. Before any records are transferred the client needs to sign a **Transfer of Records Form**.

ix) Evaluation and Mark Postings:

All grades and evaluations are to be kept in a secure location allowing access to only the faculty and staff that require this information to perform their duties. The grades are not to be discussed with anyone outside the VCDH. All grades are posted under a secret code. If students suspect that others are aware of their secret code they may request a change.