



Policies, Procedures and Guidelines

Complete Policy Title:

Privacy Governance and Accountability Framework

Approved by:

President

Policy Number (if applicable):

Date of Most Recent Approval:

Date of Original Approval(s):

June 16, 2015

Supersedes/Amends Policy dated:

The purpose of this Responsible Executive:

University Privacy Officer

Enquiries:

[University Secretariat](#)

DISCLAIMER: *If there is a Discrepancy between this electronic policy and the written copy held by the policy owner, the written copy prevails*

Scope and Purpose

This Policy applies to all McMaster University faculty, staff and students when handling personal information or personal health information on behalf of the institution.

The purpose of this Policy is to set out the accountabilities for ensuring that all individuals involved in the planning, management and day-to-day operations of McMaster University are in compliance with the *Freedom of Information and Protection of Privacy Act* (FIPPA), RSO, 1990 and with the *Personal Health Information Protection Act* (PHIPA), SO, 2004, their associated regulations and the privacy policies, procedures and practices set out by McMaster University.

The accountability for ensuring that entities and individuals associated with McMaster University comply with FIPPA and PHIPA, and all relevant regulations, policies, procedures, and guidelines is distributed as follows:

Entity	Overarching Accountability	Accountabilities	Day-to-Day Authorisation
McMaster University	President	<p>Ensure that personal information in the University's custody or control is collected, used and disclosed in accordance with FIPPA and/or PHIPA and with University policy.</p> <p>Ensure that relevant information and training is provided to all faculty, staff and students.</p> <p>Ensure that McMaster University prepares an annual privacy report in respect of the University's operations.</p> <p>Ensure that McMaster University, in any agreement with a vendor in respect of Personal Information (PI) or Personal Health Information (PHI), includes provision to require the vendor to comply with the relevant legislation, regulations and policies, procedures and practices in respect of FIPPA and/or PHIPA.</p>	Privacy Officer
Faculty of Health Sciences	Dean and Vice President, Faculty of Health Sciences	<p>Ensure that McMaster University employees, contracted workers, volunteers, students and vendors in the Faculty of Health Sciences who have access to PHI in the course of their work, comply with PHIPA and with relevant policies, procedures, and practices of the University.</p> <p>Ensure in written agreements with affiliated organizations that their agents similarly comply with relevant legislation and policies, procedures and practices of the University.</p>	Chief Operating Officer

Roles and responsibilities of individuals with delegated day-to-day authorisation to manage the privacy requirements of FIPPA and PHIPA in specific sectors of the University are outlined below:

Entity	Day-to-Day Authority	Roles and Responsibilities
McMaster University	Privacy Officer	To provide McMaster University with guidance and direction on privacy issues; review and provide input into privacy related policies and procedures for FIPPA and PHIPA; review privacy educational material and provide assistance with privacy training for faculty, staff and students as required; make privacy information and practices available to the public by keeping website and other communication materials up to date and accessible; lead the development of privacy training and education for University staff and agents with access to PI and/or PHI; facilitate initial and ongoing training for staff and agents; respond to privacy inquiries; lead breach management response, liaise with the Information and Privacy Commission on the adjudication of appeals.
Faculty of Health Sciences	Chief Operating Officer	To ensure compliance with University privacy policies within the Faculty of Health Sciences, specifically with respect to the requirements of PHIPA; to ensure agreements for PHI are in place with all organizations, vendors, or other agents that have been granted access to PHI.
Maternity Centre of Hamilton	Clinic Director, Maternity Centre of Hamilton	To ensure compliance with University privacy policies, specifically in relation to the requirements of PHIPA; to ensure agreements for PHI are in place with all organisations, vendors, or other agents that have been granted access to PHI.
David Braley Sports Medicine Clinic	Clinic Director, David Braley Sports Medicine Clinic	To ensure compliance with University privacy policies, specifically in relation to the requirements of PHIPA; to ensure agreements for PHI are in place with all organisations, vendors, or other agents that have been granted access to PHI.

Student Wellness Centre	Clinic Director, Student Wellness Centre	To ensure compliance with University privacy policies, specifically in relation to the requirements of PHIPA; to ensure agreements for PHI are in place with all organizations, vendors, or other agents that have been granted access to PHI.
Physical Activity Centre of Excellence (PACE)	Director, Physical Activity Centre of Excellence	To ensure compliance with University privacy policies specifically in relation to the requirements of PHIPA; to ensure agreements for PHI are in place with all organizations, vendors, or other agents that have been granted access to PHI.

Related Documents:

Policy for Handling of Personal Health Information
Policy for Handling of Personal Information
Policy on Access to Personal Health Information
Policy on Correction of Personal Health Information
Background Check Policy
Privacy Breach Protocol
Electronic Mail Protocol for Personal Information and Personal Health Information
Portable Storage Device Policy
McMaster Lock-box Protocol
Guideline for Verifying Identity
Guideline on Withdrawal of Consent
McMaster Statement of Information Practices