Carewest Privacy Management Program

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INNOVATIVE HEALTH CARE

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Carewest Privacy Risk Management Program

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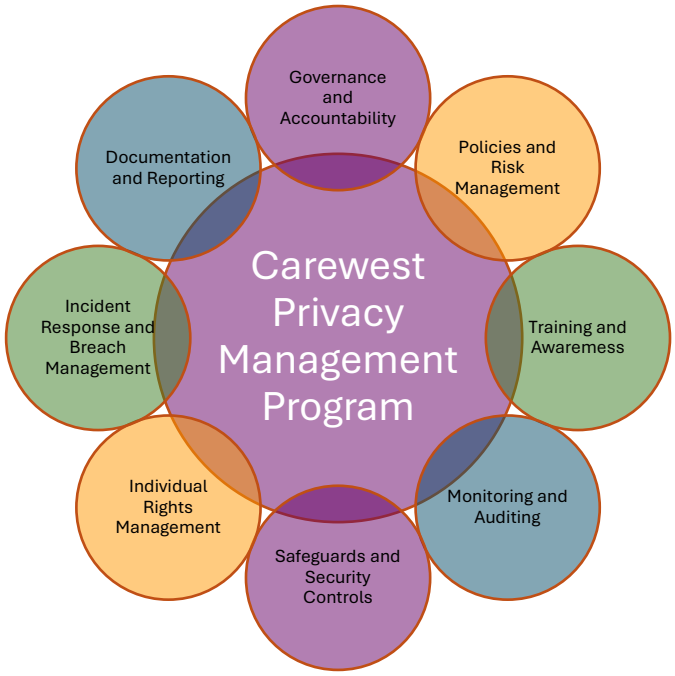
Building trust through transparency and accountability

About Carewest

As Calgary's largest public care provider of its kind and one of the largest in Canada, Carewest operates 14 locations aimed at helping people live more independent lives. Our spectrum of care is available to adults of all ages and includes long-term care, rehabilitation and recovery services, complex mental health, and community programs and services. We pride ourselves on our ability to change with the community's needs and we do our best to predict what those needs may be in the future.

Why Privacy Matters

Building public trust is important at Carewest and we achieve this through our *Vision Mission Values.* We believe that accountability directly strengthens public trust as we demonstrate being transparent and actively responsible for protecting health and personal information through compliance using proactive measures. Our goal is to clearly communicate Carewest privacy practices so that individuals feel confident that their data is handled securely and ethically.



Our Privacy Management Program Mission

Fostering a culture of compliance and transparency that strengthens public trust.

What is the Privacy Management Program?

A PMP is a dynamic framework of policies, procedures, and tools designed to safeguard privacy and align organizational practices with HIA, POPA and ATIA. We protect your health and personal information through strong safeguards and compliance with Alberta's privacy laws.

The program promotes accountability by defining clear roles, responsibilities, and processes for managing privacy risks. It demonstrates a strong commitment to privacy, fostering trust among Albertans, employees, and partners. Through robust safeguards, it protects personal information and related data, while applying proactive risk management strategies to identify, assess, and mitigate potential privacy issues. Finally, the PMP integrates privacy into business operations, supporting organizational objectives and enabling innovation without compromising individual rights.

Governance & Accountability

Safeguards & Security Controls

Individual Rights

Incident Response & Breach Management

Training & Awareness

Your Rights & How We Protect You

Your Rights:

- Access to your health and personal information
- Request corrections
- Know how your data is used

How We Protect You:

- Administrative, physical, and technical safeguards
- Mandatory breach reporting
- Privacy Impact Assessments
- Monitoring and Auditing

Governance & Awareness

Data Classification

Carewest has a duty to protect information in its custody and control from unauthorized access. Under Carewest policy *Information Classification* (AM-04-03-06), all information in the custody and control of Carewest has an information classification level and corresponding labelling and handling controls applied to it. Information is protected in accordance with the applied classification.

Applied classification is in accordance with the risk posed to the organization should the information be compromised. Classification levels applied are used to direct security controls and are required to protect health information, personal information, and business information.

Roles & Responsibilities

Carewest's privacy program is overseen by the **Chief Privacy Officer (CPO)**, who reports to the **Chief Operating Officer** and ultimately the **Carewest Board**. This governance model ensures compliance with privacy legislation, Health Shared Services (HSS) policies, and promotes organization-wide awareness.

The **Health Information Management (HIM)** team supports the CPO by managing privacy compliance, promoting the Privacy Management Program, handling third-party requests, and tracking disclosures. An **Access to Information Coordinator (ATIC)** responds to inquiries through a monitored public email to ensure timely communication.

Carewest's ***Delegation of Authority and Responsibilities for Compliance with ATIA, POPA, and HIA*** **(AM-04-03-04)** policy establishes accountability for all staff in handling personal and health information. The **Executive Leadership Team** receives regular updates on privacy trends, policies, Privacy Impact Assessments (PIAs), risk assessments, and safeguards.

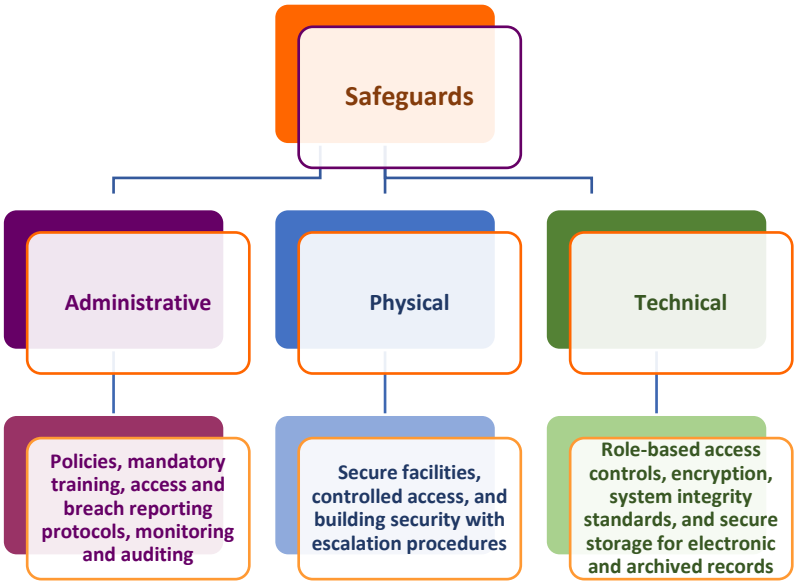
Core Principles:

- Apply privacy legislation in daily operations
- Limit collection, use, retention, and disclosure to what is necessary
- Maintain reasonable controls and safeguards

Key Responsibilities:

- Oversight by CPO and COO
- Training and awareness initiatives
- Privacy incident response
- Information governance and compliance
- IT security and risk management
- Vendor contract and legal review
- PIA endorsement and monitoring

Safeguards & Security Controls



Carewest is committed to protecting personal and health information while maintaining transparency and efficiency. Our Privacy Management Program applies to all staff, contractors, and volunteers, ensuring compliance with InfoCare behaviors and relevant training.

Key Policies and Practices:

- **Privacy Breach Reporting:** All staff must promptly report breaches via cal.carewestreportaprivacybreach@ahs.ca.
- **Information Classification & Access:** Policies define how data is categorized and accessed only by authorized personnel.
- **Technology Use:** Staff must follow secure IT practices for IDs, passwords, email, and system access. Leaders authorize access to critical systems.
- **System Integrity:** Acquisition and decommissioning of systems follow vendor agreements and security protocols.
- **Physical Security:** Archived records are stored securely; on-site security and escalation protocols protect facilities.
- **Information Transport:** Staff must maintain privacy when moving information.
- **Intelligent Automation:** AI use is permitted under guidelines to optimize benefits and minimize risks at the same time safeguarding personal and health information.
- **Policy Development:** Policies provide clear direction, comply with legislation, and undergo review every three years or as needed.
- **Monitoring and Auditing**: Processes verify compliance, identify risks and gaps, and drive continuous improvement.
- **Enterprise Risk Management:** A consistent framework informs decision-making and planning.

Privacy Impact Assessments (PIAs): Carewest ensures compliance with HIA, AITA, and POPA through documented processes that identify and mitigate privacy risks.

Contractors and Volunteers:

- Contractors must follow Carewest policies, privacy legislation, and sign declarations after orientation.
- Volunteers complete orientation and sign confidentiality agreements to protect client privacy.

Individual Rights

Access to Information

Carewest supports timely access and correction of personal and health information under ATIA, POPA, and HIA. Contact details for inquiries are posted on Carewest.ca. The Chief Privacy Officer (CPO) acts as Access to Information Coordinator via CarewestAccess&Privacy@ahs.ca.

Responsibilities:

- Address access and privacy concerns.
- Collaborate with Health Information Management (HIM) and other teams for compliance.
- Consult with Assisted Living Alberta and Health Shared Services on complex cases.

Policies ensure confidentiality and integrity of information. The website provides tools and instructions for access requests.

Health Information Requests

- Requests can be formal or informal.
- Formal requests allow review by the Office of the Information and Privacy Commissioner (OIPC); informal requests do not.
- Third-party requests require consent; forms are available online.
- HIM team verifies authorization, ensures compliance, and supports staff using Quick Release.

Quick Release & Disclosure

Connect Care enables immediate release of health information per Carewest policy *Collection, Access, Use and Disclosure of Information* (AM 04-03-17). Internal resources on Careweb guide staff on compliance.

Personal Information

Policy *Delegation of Authority and Responsibilities for Compliance with ATIA, POPA, HIA* (AM 04-03-04) authorizes HR and HIM teams to release personal information. HIM maintains records of all third-party requests.

Correction of Information

Clients can request corrections via MyChart or Health Shared Services. Errors must be corrected by the original author. The CPO manages OIPC reviews.

Connect Care Data Requests

Carewest reviews flagged anomalies and can request reports proactively through the CPO, Privacy Program Director and/or Executive Director, People, Talent & Wellness.

Consent Management

Carewest informs employees about how their personal information is collected, used, and disclosed through consent forms, orientation materials, and the intranet. Information is also gathered during HR onboarding, which may include background checks with employee consultation.

Carewest posts HIA and Personnel Notices in all departments to explain the purpose and authority for data collection. Any disclosure beyond these purposes requires express consent.

Written consent or proof of authority is required to disclose health or personal information unless exempt under HIA, ATIA, or POPA. Forms and instructions are available at www.carewest.ca.

Health Information Act (HIA)

- Consent must be **knowledgeable, voluntary, and related to the purpose** of collecting or disclosing health information.
- Individuals can give **express consent** (written or verbal) or **implied consent** in certain circumstances.
- Patients have the right to **withdraw consent** at any time.

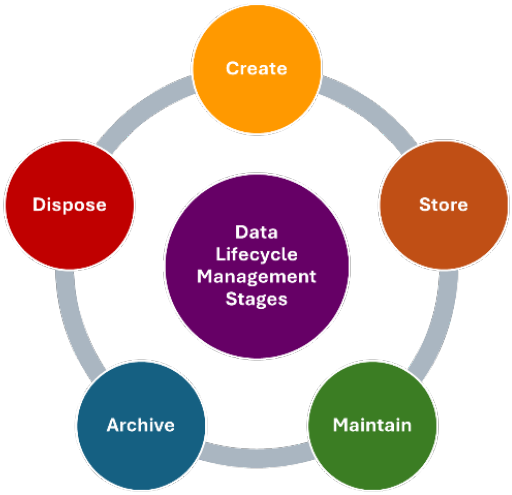
Access To Information Act (ATIA)

- Consent is relevant when **personal information is requested for disclosure**.
- Individuals must authorize release of their own information unless disclosure is permitted by law.
- Protects against unauthorized sharing of identifiable data.

Protection of Privacy Act (POPA)

- Requires **informed consent** for collection, use, and disclosure of personal information.
- Consent must be **specific and time-limited**.
- Organizations must provide clear notice of **purpose and authority** for data collection.

Documentation Retention & Destruction Cycles



Data retention is the practice of storing, archiving and retaining data to support internal business processes (health records, analytics, auditing) and to comply with legislation. Carewest, as an affiliate of Assisted Living Alberta, is committed to managing records in compliance with HSS standards in accordance with the governing services agreement, and HIA, ATIA, POPA legislation. As such, Carewest will align its records management processes with HSS-approved standards and guidelines.

Under Carewest policy *Records Management* (AM-04-03-05), Carewest is responsible for safeguarding the privacy, security, accuracy, and integrity of all records—both paper and electronic—under its custody.

Carewest leaders in collaboration with Health Information Management (HIM), are accountable for applying lifecycle management practices within information storage environments to maintain compliance. HIM ensures the authenticity, reliability, and usability of records throughout their lifecycle, meeting all regulatory and organizational standards.

Incident Response & Breach Management

Upon submission, reporters receive an automated response which includes acknowledgement of receipt of their incident.

Breach management protocols are defined in Carewest *Breach Protocol* (AM-04-03-18) policy and supported by process maps for clarity and ease of use.

These process maps provide direct access to key resources:

- **Tips for Managers** – Guidance for early assessment and mitigation of breaches.
- **Risk of Harm Template** – Tool for evaluating potential harm resulting from a breach.
- **Sample Notification Letters** – Templates for communicating with affected individuals, with customization support from the Chief Privacy Officer.
- **Client Response FAQs** – AHS resource outlining common questions and confidentiality reminders.
- **Privacy Learning Plan** – Educational tool for addressing knowledge gaps contributing to breaches.
- **InfoCare Documents** – Reinforcing InfoCare behaviors.

The process also includes links for mandatory reporting to Health Shared Services (HSS), Office of the Information & Privacy Commissioner (OIPC), and TPAC Underwriters (Third Party Administrator Coverage) when breaches involve third-party access to Connect Care.

Training & Awareness

Carewest ensures privacy compliance through clear communication, policies, and programs that support consistent decision-making. Training and awareness initiatives apply HIA, ATIA, and POPA to Carewest operations, especially during major policy changes.

Organizational Learning

Carewest uses the HSS privacy and security program, **InfoCare**, which includes scenarios, videos, and tools. All staff must complete the mandatory online module **On Our Best Behaviours (OOBB)**. Completion is tracked in MyLearning Link, and Directors can monitor compliance. Frequency of training is based on role and level of access.

Contractors and Volunteers

Contractors must follow Carewest policies, privacy legislation, and sign declarations after orientation. Volunteers complete site-specific orientation, confidentiality training, and sign agreements upon recruitment.

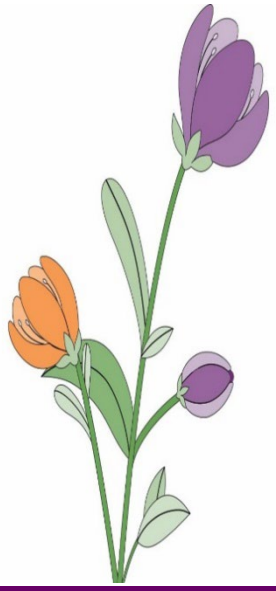
InfoCare Coaching

Resources are shared via email, meetings, and Careweb. InfoCare Coaches promote privacy practices and provide peer support. Carewest encourages staff to become coaches, earning recognition from HSS Privacy.

ATIA and POPA Training

HIM and Privacy leaders completed Alberta Government courses on ATIA and POPA and continue learning through MyLearning Link modules.

Key Privacy Principles
Accountability – Assign responsibility for compliance and maintain oversight mechanisms.
Transparency – Ensure policies and practices are clear and accessible.
Purpose Limitation – Collect only what is necessary for defined, lawful purposes.
Consent – Obtain valid consent for collection, use, and disclosure of personal information.
Accuracy – Keep information accurate and up to date.
Safeguards – Apply administrative, technical, and physical measures to protect data.
Access and Correction Rights – Respect individuals' rights to access and correct their information.
Retention and Disposal – Retain data only as long as necessary and dispose of it securely.
Risk Management – Monitor and mitigate privacy risks through audits and assessments.
Continuous Improvement – Regularly review and update privacy practices to align with evolving standards.



Contact Us:

Website: www.carewest.ca

Email: Carewestaccess&privacy@ahs.ca

Report a Breach: carewestreportaprivacybreach@ahs.ca

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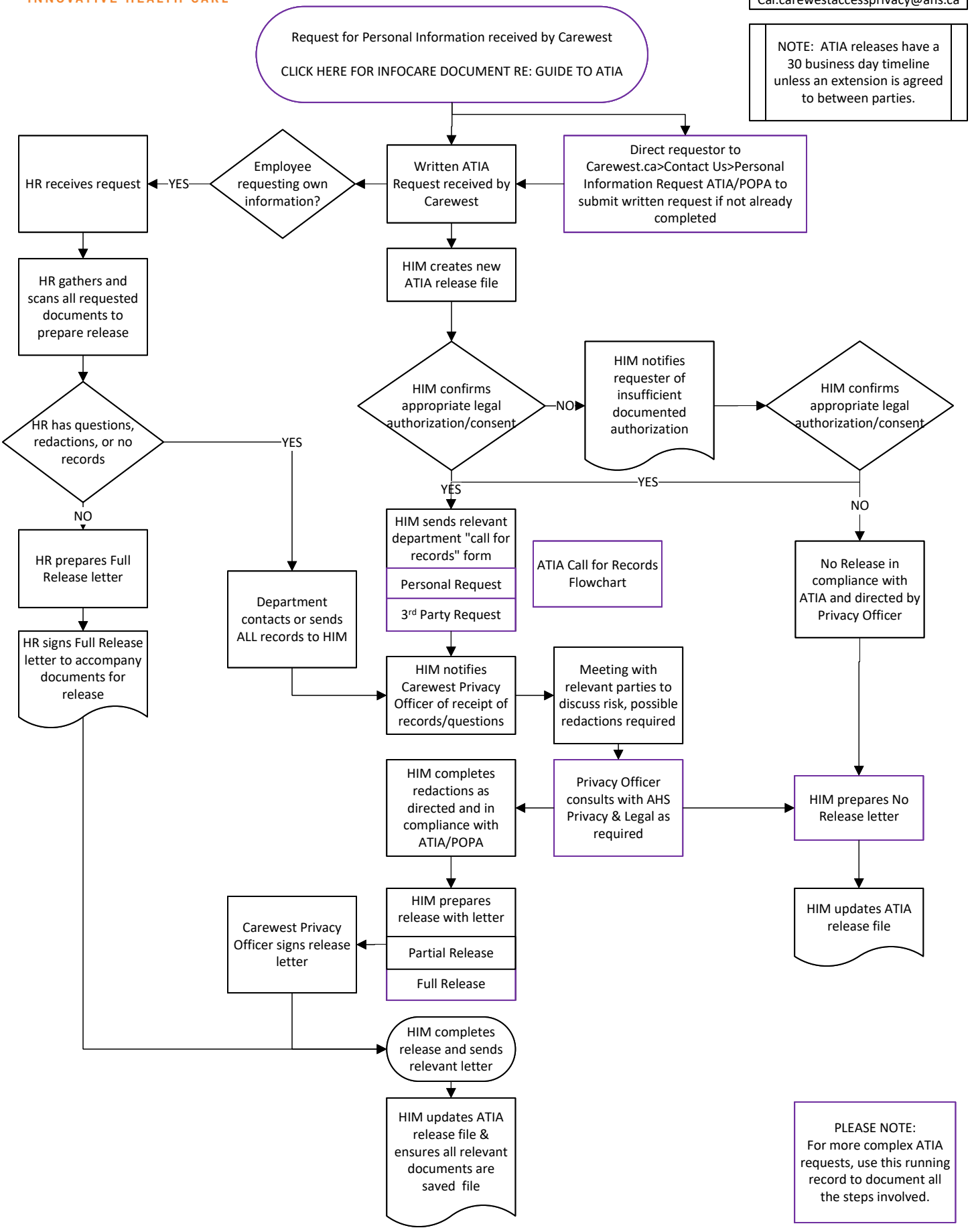
ATI Coordinator email
Cal.carewestaccessprivacy@ahs.ca

NOTE: ATIA releases have a 30 business day timeline unless an extension is agreed to between parties.



PLEASE NOTE:
For more complex ATIA requests, use this running record to document all the steps involved.

CONNECT CARE BREACHES EVENT MANAGEMENT PLAN

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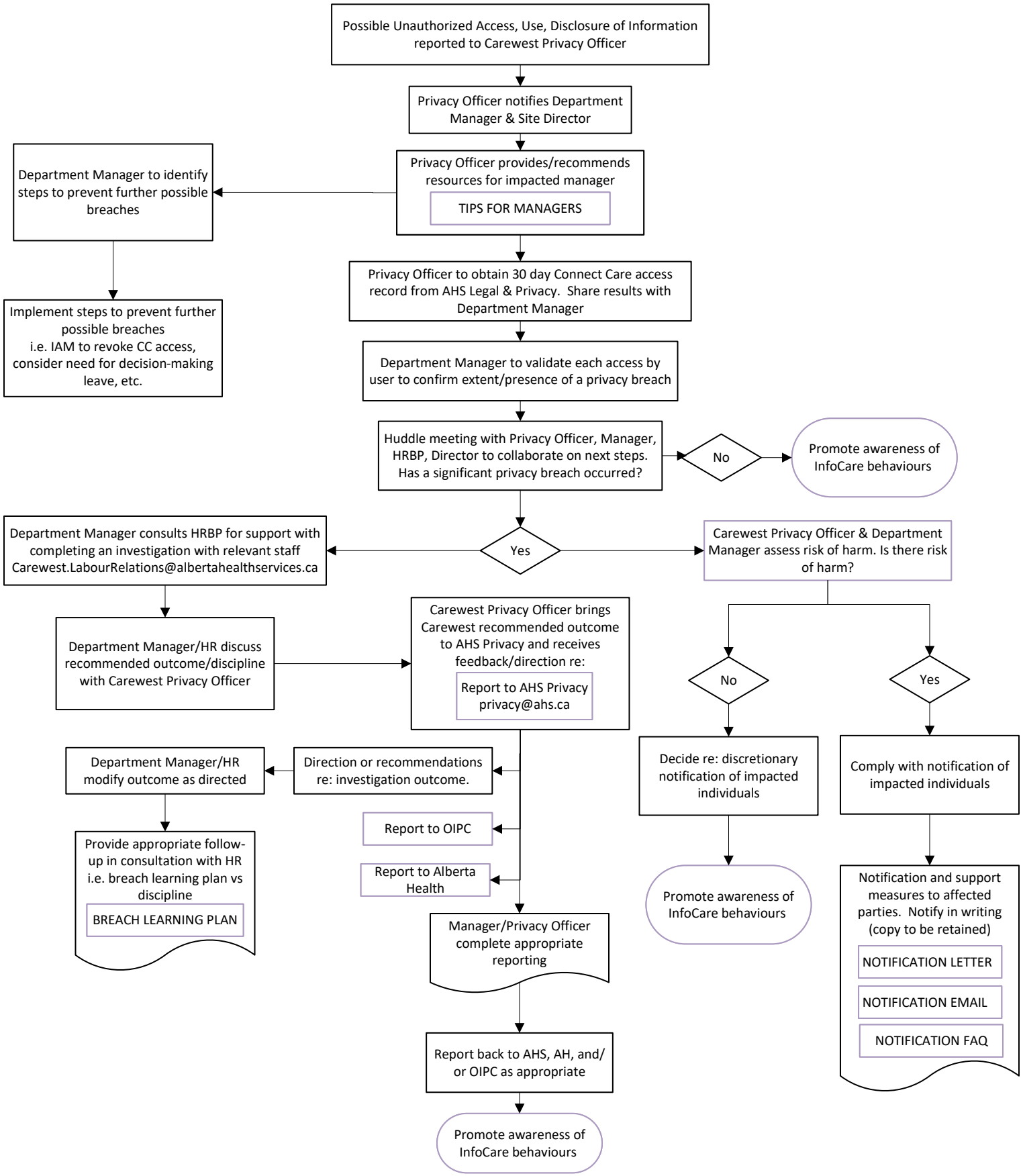

PRIVACY BREACH
Other (Non-Connect Care) Breach
EVENT MANAGEMENT PLAN

Possible Unauthorized Access, Use, Disclosure of Information (idenfied by staff, internal audit etc.)
UOR completed

Notify Manager of Department Involved

Department Manager to determine if a breach has occurred. Reach out to HR for support as needed for this determination.

No → Promote awareness of InfoCare behaviours

Yes

Department Manager to identify steps to prevent further possible breaches

Implement steps to prevent further possible breaches
i.e. recall email, request info be deleted
HOW TO RECALL AN EMAIL

Department Manager to identify source of the breach

Department Manager consults HRBP for support with completing an investigation with relevant staff Carewest.LabourRelations@albertahealthservices.ca

Provide appropriate follow-up in consultation with HR i.e. breach learning plan vs discipline
BREACH LEARNING PLAN

Department Manager to notify Carewest Privacy Officer at earliest opportunity

Carewest Privacy Officer will direct Manager to available resources.
TIPS FOR MANAGERS

Carewest Privacy Officer to advise re:
- Consult with AHS legal
- Report to AHS Privacy privacy@ahs.ca
- Report to OIPC
- Report to Alberta Health

Manager/Privacy Officer complete appropriate reporting

Follow up on any direction or recommendations received

Report back to AHS, AH, and/ or OIPC as appropriate

Promote awareness of InfoCare behaviours

Department Manager takes steps to mitigate risk related to the breach.

Carewest Privacy Officer will support risk assessment. Is there risk of harm?

No → Decide re: discretionary notification of impacted individuals → Promote awareness of InfoCare behaviours

Yes → Comply with notification of impacted individuals

Notification and support measures to affected parties. Notify in writing (copy to be retained)
- NOTIFICATION LETTER
- NOTIFICATION EMAIL
- NOTIFICATION FAQ

Appendix 3

InfoCare Behaviours

The behaviours empower Carewest people to use their professional judgement while collecting, accessing, using and disclosing health information, personal information, and business information.
For more information visit the InfoCare insite page and see policy 1177 - Privacy Protection and Information Access

Act on Need - We collect, use and share only the personal and health information that we require to perform our job duties and responsibilities.

Consider Purpose - We use and access personal and health information for purposes consistent with its collection or as authorized by law.

Safeguard Information - We take reasonable measures to safeguard all health and personal information to meet Carewest policies, procedures, standards, protocols and guidelines.

Control Multimedia - We recognize that photographs, audio, and video recordings may include personal and health information and are mindful of how we use these media.

Manage Carewest Information - We appreciate and safeguard the value and confidentiality of Carewest business information.

Speak Up - We speak up about any perceived departure (accidental or intentional) from these behaviours with each other, to our leaders, and/or through other Carewest mechanisms for reporting.

Advocate & Learn - We ask questions of our leaders, seek resources, complete training and follow best practices.

Disclose Mindfully - We exercise professional judgement when disclosing to others to ensure it is acceptable, whether authorized by law or with consent.

Provide Access - We ensure that our health, personal, and Carewest business information is available to the public in a timely manner; in accordance with proper processes to obtain access.

Enable Sharing - We enable information sharing where appropriate, to contribute to healthcare excellence and patient outcomes.

Updated: September 2023

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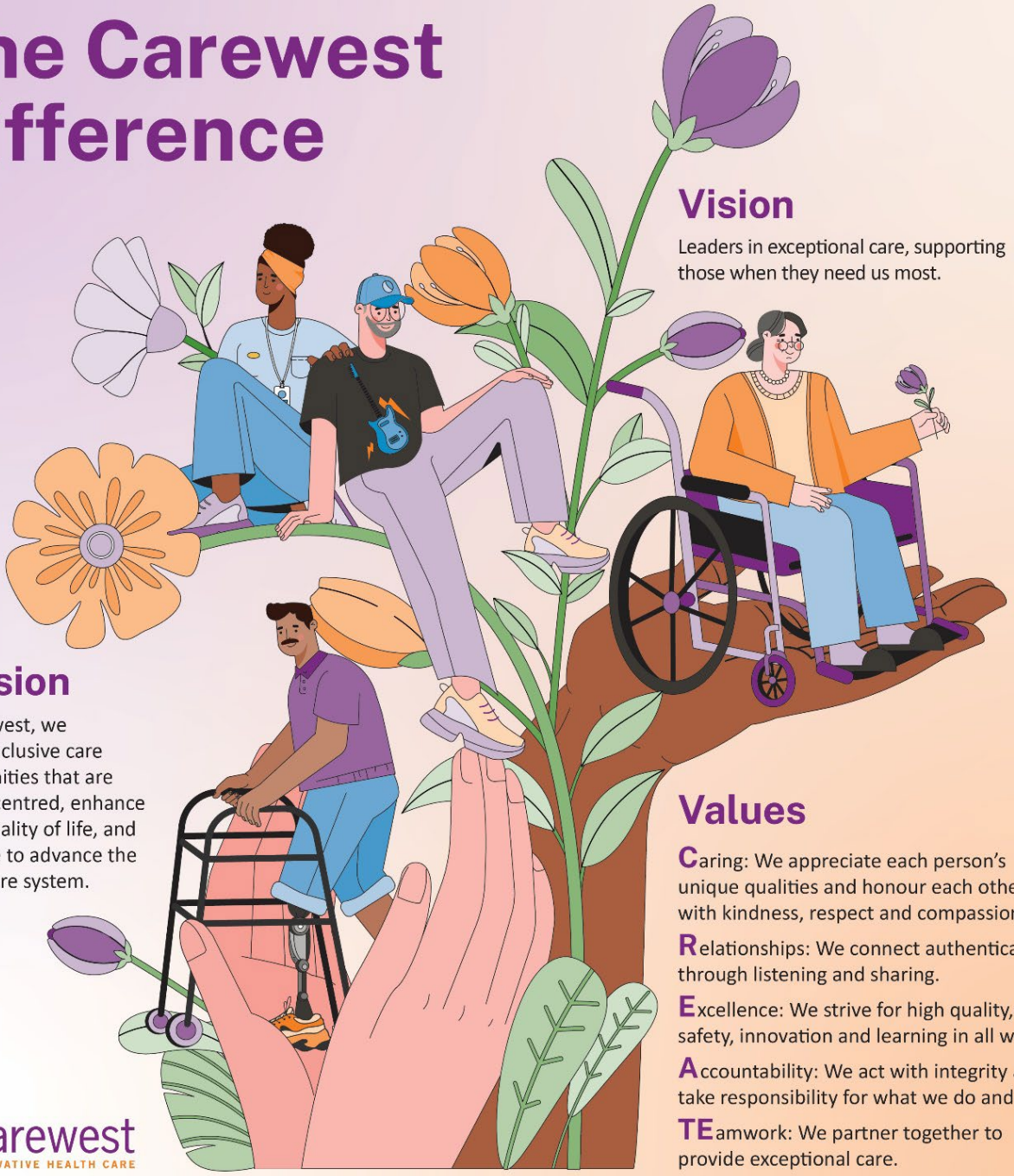
Alberta Health Services

The Carewest Difference



Vision

Leaders in exceptional care, supporting those when they need us most.

Mission

At Carewest, we create inclusive care communities that are person-centred, enhance client quality of life, and innovate to advance the healthcare system.

Values

Caring: We appreciate each person's unique qualities and honour each other with kindness, respect and compassion.

Relationships: We connect authentically through listening and sharing.

Excellence: We strive for high quality, safety, innovation and learning in all we do.

Accountability: We act with integrity and take responsibility for what we do and say.

TEamwork: We partner together to provide exceptional care.

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