



- Welcome to a webinar about understanding BC's Personal Information Protection Act or PIPA for short.
- If you're a physician or MOA working in a private practice, this webinar is for you.

WHY WOULD ANYONE COMPLAIN?

- Potential reasons
 - Personal information handling practices
 - Unauthorized collection
 - Unauthorized use
 - Unauthorized disclosure
 - Unauthorized destruction
 - Refusal of access or correction
- Source
 - Patient or employee (verbal, email, written)
 - OIPC investigation



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Any number of things might lead to a complaint and individuals have a right to challenge an organization about how their personal information has been handled.

- It can be about anything someone perceives as being wrong
 - Mishandling of their personal information
 - You asked for more information than they think you should need for the purpose or you didn't have consent for the collection
 - You used their information for unauthorized purposes
 - You disclosed it without their permission
 - or permitted their records to be snooped by an employee not requiring access to it to do their job
 - You disposed of it prematurely
 - You refused them access to their own information to protect their safety, physical or mental health
 - or you refused to correct information that you aren't allowed to such as a professional or expert opinion
- A complaint could be received from
 - a patient or employee verbally, by email, in writing or come from the
 - Office of the Information and Privacy Commissioner as part of an investigation



It may even relate to a breach that you didn't know about like sending something to the wrong

- postal address or
- fax number or
- email address

TRAIN EMPLOYEES

- Ask questions to clarify the nature of the complaint
- Validate the identity of the complainant
- Record date received and nature of complaint
- Acknowledge receipt of the complaint promptly
- Fair and impartial investigation
- Notify the complainant of
 - the outcome
 - steps taken
 - steps to be taken
 - recourse options
- Change information handling policies and practices



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Employees need to know that all complaints are to be taken seriously and to

- Ask questions of the complainant. Each case may be unique so it's hard to document in advance what these should be.
- Validate the identity of the complainant which should be outlined in the privacy procedures
- Make a record of the date received and nature of the complaint
- Acknowledge the complaint promptly by email or in writing
- Conduct a fair and impartial investigation
- Notify the complainant of
 - the outcome of the investigation
 - steps taken
 - steps that will be taken and
 - options for recourse

A patient may make a complaint to the Office of the Information and Privacy Commissioner if they are not satisfied with the response they received to their complaint.

The Commissioner has the authority to investigate and resolve privacy complaints.

- Change information handling policies and practices if necessary

Formally documenting the procedures for repeated complaints will make the process more efficient and support employee training

WEBINAR RESOURCES

- College Standards and Guidelines
<https://www.cpsbc.ca/for-physicians/standards-guidelines>
- Doctors of BC Privacy Toolkit and webinar notes (PDF)
<https://www.doctorsofbc.ca/privacy-toolkit-webinars>
- Office of the Information & Privacy Commissioner for BC:
 - Guide to PIPA
 - Privacy Breach Tools and Resources
 - Accountability Tips
 - Getting Accountability Right
 - Self-Assessment Tool for Securing Personal Information
 - Cloud Computing Guidelines
 - Guidance Document: Information Sharing Agreements
<https://www.oipc.bc.ca/guidance/guidance-documents/>



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Links to these Resources are in a PDF document on the Webinars page of the Privacy Toolkit

- College Standards and Guidelines
- Doctors of BC Privacy Toolkit and webinar notes
- and Privacy Commissioner guides, tips and resources



PIPA SHORTS

BC's Personal Information Protection Act

QUESTIONS?

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 **doctors of bc**
British Columbia Medical Association

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Let us know if you have any questions about complying with PIPA