


# MOMIJI HEALTH CARE SOCIETY

	<b>Developer:</b> I.T. Manager	<b>Category:</b> Information Technology	<b>Domain:</b> General Administration	<b>Policy #:</b>
	<b>Effective Date:</b> February 2021	<b>Subject Title:</b> Personal Health Information – Challenging Compliance		<b>Approval:</b> Management Committee
	<b>Last Reviewed:</b> February 2021	<b>Next Review:</b>	<b>Supersedes:</b> N/A	<b>Pages:</b> 2

## POLICY

An individual shall be able to challenge an organization’s compliance with the above principles. Their challenge should be addressed to the person accountable for the organization’s compliance with the Personal Information Protection and Electronics Document Act, usually their Privacy Officer (PO).

## PROCEDURES:

### Complaints to Momiji Health Care Society

- Any person may submit a complaint and/or other feedback (including inquiries, compliments and suggestions) related to:
  - Momiji Health Care Society (MHCS)’s privacy and data protection practices;
  - MHCS’s information management practices; or
  - Non-compliance with MHCS’s policies, or statutory or regulatory requirements.
- Complaints and/or other feedback may be submitted by hand delivery, post, and telephone using the following MHCS contact information:
  - Privacy Office
  - Momiji Health Care Society, 3555 Kingston Road,
  - Scarborough, ON M1M 3W4
  - Telephone: 416.261.6683 X 255.
- MHCS shall accept anonymous complaints and/or other feedback; however, it requires the sender’s name and address, telephone number or email address in order to provide the individual with a response/acknowledge receipt in return.
- The PO reviews all complaints and/or other feedback.
- MHCS shall acknowledges receipt of a complaint and/or other feedback within seven days of the receipt.
- The PO will investigate all privacy complaints. If a complaint is found to be justified, the PO will make recommendations regarding appropriate corrective measures to be taken.

- MHCS shall send a response regarding the outcome of the investigation to the individual within 30 days of the receipt of the complaint and/or other feedback. If there is a delay in sending the response, the individual shall be notified the expected, approximate time frame.
- The PO maintains procedures to receive, forward, manage, close and monitor complaints and/or other feedback.

### **Complaints to the Information and Privacy Commissioner of Ontario (IPC)**

- The Information and Privacy Commissioner of Ontario (IPC), appointed by the Ontario Legislature and is independent of the government of the day, is an oversight body responsible for educating the public concerning their rights under the privacy legislation and ensuring that organizations fulfill their obligations under the legislation.
- Individuals may file a complaint with the IPC if:
  - they feel that they have been incorrectly refused access to their personal health information (PHI);
  - a health information custodian denied to make a requested correction to their PHI;
  - more than 30 days has passed since the access or correction request was made, and the client has not received a response;

- Complaints should be sent to:  
Information and Privacy Commissioner of Ontario  
2 Bloor Street East, Suite 1400  
Toronto, ON M4W 1A8  
Telephone: 416-326-3333 • 1-800-387-0073  
Fax: 416-325-9195  
Website: [www.ipc.on.ca](http://www.ipc.on.ca)