

**CATHOLIC FAMILY SERVICES OF TORONTO**  
**AGENCY GUIDELINES AND PROCEDURES**  
**PRIVACY COMPLIANCE PROGRAM - COMPLAINTS**

**INTRODUCTION**

Catholic Family Services of Toronto understands and respects the importance of protecting a person's privacy and is fully committed to fulfilling its responsibilities around privacy. The Agency has policies, procedures and guidelines that address all matters regarding personal information.

The Agency places a high priority on effectively dealing with any privacy complaints. The objective with privacy complaints is to achieve an effective resolution of a person's complaint within a reasonable time frame. The complaint procedure should be easily accessible and complaints are handled fairly, promptly and appropriately.

**DEFINITION OF PRIVACY COMPLAINT**

A privacy complaint relates to any concern that a person has with the Agency's privacy practices as it relates to the person's personal information. Privacy practices include how personal information is collected, stored, used, disclosed, retained and destroyed. Privacy practices also include how a person's access to their personal information is provided.

**COMPLAINT PROCEDURES**

1. The complainant will be encouraged to discuss their privacy complaint with the person with whom they have had primary contact at the Agency, in order to attempt to resolve the issue.
2. If the privacy complaint is not resolved, or the complainant chooses not to address the issue with their primary contact at the Agency, or this person is not available, the matter will be referred to the Chief Privacy Officer, who is the Executive Director, for investigation.
3. The person's complaint may be made in writing or by telephone.
4. When a complaint is received, a record will be made of the date and the nature of the complaint. If not contacted directly by the complainant, the Chief Privacy Officer will receive a copy of the complaint.
5. Receipt of a complaint will be promptly acknowledged. In the event that an anonymous complaint is received, the Agency will note the issue, investigate and try to resolve it appropriately using the facts conveyed in the complaint.
6. The Chief Privacy Officer may assign the complaint investigation to a person with the necessary skills for reviewing it fairly and impartially, and this person will be provided with access to all relevant records, employees or others who handled the personal information or the access to personal information request.
7. If necessary, the person who registered the complaint will be contacted to clarify the complaint by providing further information, and to discuss options for resolution.

8. The complaint will be investigated in line with the Agency's privacy policy, guidelines and procedures and the decision of the investigator will be recorded.
9. Prompt notification will be given to the complainant of the outcome of the investigation, and this information will be communicated clearly in writing. The complainant will be informed of any relevant steps taken, which may include correction of any inaccurate personal information.
10. When relevant, Agency policies and procedures will be reviewed internally and any resultant changes will be communicated to staff.
11. If the complainant is dissatisfied with the outcome of the investigation by the Chief Privacy Officer's designate, and the steps taken to resolve the issue, the complainant may refer the complaint, in writing, to the Chief Privacy Officer. The Chief Privacy Officer will review the complaint and the steps taken to resolve it, and will make a decision. The complainant will be notified of this determination in writing.
12. The Chief Privacy Officer will keep a record of all complaints, the steps taken, the results of the investigation, the proposed resolution, and the outcome. A file of these records will be securely stored and incidences will be reported to the Information and Privacy Commissioner of Ontario in accordance with Part X of the *Child, Youth and Family Services Act*.
13. If the complainant remains dissatisfied with the outcome, the complainant may refer their complaint to the Information and Privacy Commissioner of Ontario.

#### RELATED DOCUMENTS

- 1.3. Board Policy – Privacy Compliance Program
- 5.15 Confidentiality of Client Information and Informed Consent for the Release of Information
- 5.26 Board Policy on Secure Storage of Client Records
- 6.2 Board Policy on Client Access to Records
- 6.2.i Agency Guidelines and Procedures – Client Access to Records
- 9.8 Agency Guidelines and Procedures – Protection of Personal Information (for Staff, Students and Volunteers)
- 9.9 Board Policy on Employee Access to their Confidential Personnel File
- 9.10 Board Policy on Retention and Destruction of Personnel File

1.3.i Privacy Compliance Program Complaint Procedures  
Reviewed by Management Team – 2017; March 17, 2021

Date of Next Review – 2025