



Information and Privacy  
Commissioner/Ontario

Commissaire à l'information  
et à la protection de la vie privée/Ontario

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*Personal Health Information Protection Act*

REPORT

FILE NO. HI-050040-1

A Food Bank

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# *Personal Health Information Protection Act*

## **REPORT**

**FILE NO.**

**HI-050040-1**

**INVESTIGATOR:**

**Gillian Judkins**

**NON-HEALTH INFORMATION CUSTODIAN:**

**A food bank**

### **SUMMARY OF INFORMATION GIVING RISE TO REVIEW:**

A member of the public sent an anonymous fax to the Office of the Information and Privacy Commissioner/Ontario (the IPC) to advise that a food bank in their area was requesting health card numbers and recording them as identification for accessing the food bank's services. The IPC opened a file and began to work with the food bank to fulfill its obligations under the *Personal Health and Information Protection Act* (the Act).

### **RESULTS OF REVIEW:**

The IPC contacted the Treasurer of the food bank who provided the following information.

The food bank advised that the practice of collecting health card numbers had been in place since the food bank opened in 1993. The health card numbers were collected to verify the identification of individuals who were using the services of the food bank. The food bank further advised that while these numbers were collected by staff at the food bank, they were not used for any other purpose.

The food bank advised that upon receiving a call from the IPC, they contacted the Executive Director of the Ontario Association of Food Banks (OAFB) to inform them of the issue. Following this, the food bank immediately stopped the process of collecting health cards and replaced a poster and an internal tracking form that stated health cards were required for identification purposes, with updated versions that do not request health cards. Office staff were

also informed of the issue and the new changes to their procedures, as they relate to the collection of personal health information.

In addition, the Executive Director provided the IPC with a copy of their new Client Policy for review by this office. The Executive Director advised that the Board of Directors of the OAFB would be approving the policy at its meeting in September. The Executive Director has been asked to report back to the IPC following the OAFB's approval of the Client Policy at its September meeting.

On the basis of all of the above, it was determined that further review of this matter was not warranted and the file was closed.

Original signed by: \_\_\_\_\_

Ann Cavoukian, Ph.D.  
Commissioner

\_\_\_\_\_ August 21, 2006