



**RNAO submission to the College  
of Nurses of Ontario regarding  
*Confidentiality and Privacy –  
Personal Health Information*  
draft practice standard**

**June 9, 2026**



The Registered Nurses’ Association of Ontario (RNAO) is the professional association representing more than 57,250 registered nurses (RN), nurse practitioners (NP) and nursing students in all roles and sectors across Ontario. Since 1925, RNAO has advocated for healthy public policy, promoted excellence in nursing practice, increased nurses’ contribution to shaping the health system, and influenced decisions that affect nurses and the public we serve.

**Introduction**

RNAO welcomes the opportunity to provide feedback to the College of Nurses of Ontario (CNO) on the *Confidentiality and Privacy* draft practice standard. We also thank the CNO for incorporating feedback from our previous submission on Nov. 25, 2025, particularly with respect to:

- integrating gender-inclusive language
- removing references to Community Care Access Centres
- recognizing that nurses and employers share responsibility for upholding privacy and confidentiality
- providing clearer guidance on virtual care, artificial intelligence (AI) and other digital technologies

Our analysis of the current draft standard highlights key gaps and identifies additional resources that could enhance and strengthen the standard.

**Analysis**

Identified gaps and recommended resources	RNAO’s rationale
<p><b>1. Include equity-informed language</b></p> <p>The term “client” is used throughout the draft practice standard [1].</p>	<p>The term “people” should be used in place of “client”, “person” and “patient,” recognizing individuals first as people rather than solely as recipients of services or care, emphasizing an equity-centred approach [2].<sup>1</sup></p> <p>RNAO urges the CNO to reference the association’s <a href="#">People-Centred Care</a> best practice guideline (BPG) to enhance the integration of equity-informed language within the draft CNO</p>

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<sup>1</sup> People-centred care is an approach that views individuals, families and communities as active participants in trusted health systems that respond to their needs and preferences in humane and holistic ways. It recognizes the health needs of the person seeking care as well as those of their family, caregivers and community, and emphasizes shared responsibility among all involved in delivering care and services [2].

Identified gaps and recommended resources	RNAO’s rationale
	practice standard. Please refer to the note on terminology on language in table 1 on page 6 of the BPG [2].
<p><b>2. Clarify the term “custodian”</b></p> <p>The term “custodian” is used on page 3 in the disclosure principle of the draft practice standard, but its meaning may not be clear to readers [1].</p>	<p>We urge that the term “custodian” be clarified with a definition in the glossary of terms.</p>
<p><b>3. Refer to RNAO best practice guidelines (BPG)</b></p> <p>The draft practice standard does not reference RNAO BPGs. Doing so would provide the opportunity to strengthen alignment with evidence-informed resources [1,3].</p>	<p>RNAO asks that the CNO reference the following evidence-based resources in the practice standard to guide the use of AI, virtual care and other digital health technologies and support confidentiality and privacy:</p> <ul style="list-style-type: none"> <li>• <a href="#">Clinical Practice in a Digital Environment</a> BPG, particularly recommendation 5.0 [4].</li> <li>• <a href="#">Adopting eHealth Solutions: Implementing Strategies</a> BPG, particularly recommendation 2.4 [5].</li> <li>• <a href="#">Nursing and Compassionate Care in the Age of Artificial Intelligence: Engaging the Emerging Future</a> report [6] .</li> </ul>
<p><b>4. Include implementation supports</b></p> <p>We recommend that implementation supports be included to facilitate ongoing use of the practice standard.</p>	<p>RNAO recommends that the following implementation supports be provided to inform decision-making:</p> <ul style="list-style-type: none"> <li>• Education sessions through webinars</li> <li>• Case scenarios</li> <li>• FAQs</li> <li>• Decision-making trees</li> </ul> <p>Companion resources will help with the consistent and practical application of the practice standard.</p>

## Conclusion

Thank you for the opportunity to provide feedback on the *Confidentiality and Privacy* draft practice standard. We welcome the opportunity to meet with the CNO to address any questions and to support implementation and adherence to the standard.

## References

1. College of Nurses of Ontario (CNO). Confidentiality and Privacy — Personal Health Information [Draft Practice Standard]. 2026.
2. Registered Nurses' Association of Ontario (RNAO). People-Centred Care [Internet]. Toronto (ON): RNAO; 2025. Available from: <https://rnao.ca/media/9862/download>
3. Registered Nurses' Association of Ontario (RNAO). RNAO Best Practice Guidelines Program - Transforming Nursing Through Knowledge [Internet]. n.d. Available from: <https://rnao.ca/media/6220/download?inline>
4. Registered Nurses' Association of Ontario (RNAO). Clinical practice in a digital health environment. [Internet]. Toronto (ON): RNAO; 2024. Available from: <https://rnao.ca/media/8023/download>
5. Registered Nurses' Association of Ontario (RNAO). Adopting eHealth Solutions: Implementation Strategies. [Internet]. Toronto (ON): RNAO; 2017. Available from: <https://rnao.ca/media/3582/download>
6. Registered Nurses' Association of Ontario (RNAO). Nursing and Compassionate Care in the Age of Artificial Intelligence: Engaging the Emerging Future [Internet]. Toronto (ON): RNAO; 2020. Available from: [https://rnao.ca/sites/rnao-ca/files/RNAO-AMS\\_Report-Nursing\\_and\\_Compassionate\\_Care\\_in\\_the\\_Age\\_of\\_AI\\_Final\\_For\\_Media\\_Release\\_10.21.2020.pdf](https://rnao.ca/sites/rnao-ca/files/RNAO-AMS_Report-Nursing_and_Compassionate_Care_in_the_Age_of_AI_Final_For_Media_Release_10.21.2020.pdf)