

## Privacy Policy and Commitment

### Our Commitment to your Privacy

The primary care providers and staff at Rapids Family Health Team (RFHT) are bound by law and ethics to safeguard your privacy and the confidentiality of your personal information. The appropriate collection, use and disclosure of patients' personal health information is fundamental to our day-to-day operations and patient care. We strive to provide our patients with excellent medical care and service. Rapids Family Health Team employees and those who act on behalf of the team, are accountable for maintaining confidentiality and privacy of all information collected, accessed or disclosed during and after their employment or professional contact.

In order to provide health services to you and plan your care, Rapids Family Health Team needs to collect, use and disclose personal health information about you. You have a right to know how we collect, use and disclose your personal information. You have a right to expect that we will use all reasonable means to keep your personal health information accurate, confidential and secure.

### What is Personal Health Information?

Personal health information means identifying information about an individual relating to an individual's physical or mental health (including mental health history), or the provision of health care to the individual. The personal health information that we collect may include, for example, the patient's name, date of birth, address, health history, a record of a patient's visits, the records of treatment provided during those visits, payments or eligibility for health care, organ and tissue donation and health number.

### Electronic Health Records

Patient health information is to be maintained in electronic health records that are password and firewall protected. The software allows for monitoring by health professionals identified as involved in a patient's health care.

### Applicability of This Privacy Policy

Our Rapids Family Health Team Privacy Policy attests to our commitment to privacy and demonstrates the ways we ensure that patient privacy is protected. Our Privacy Policy applies to the personal health information of all our patients that is in our possession and control. RFHT complies with applicable privacy legislation including the Health Information Protection Act (November 2004), comprised of both the Personal Health Information Protection Act, 2004 (PHIPA) and the Quality of Care Information Protection Act, 2004.

Our Privacy Policy reflects our compliance with fair information practices, applicable laws and standards of practice.

### The 10 Principles of Privacy

#### 1. Accountability for Personal Information

Rapids Family Health Team is responsible for any personal health information it holds and we take our commitment to securing patient privacy very seriously. Dr. Luke Winegard, member of the Board of Directors has been designated as our Privacy Officer and contact person to assist in meeting our privacy

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obligation and compliance activities within our facility. Rapids Family Health Team demonstrates its commitment to privacy by implementing privacy policies and procedures to protect the personal health information it holds and by educating staff and others who collect, use or disclose personal health information on its behalf about their privacy responsibilities. All Rapids Family Health Team staff and those who act on behalf of the team, must abide by PHIPA, this policy and any applicable rules of professional conduct.

### **2. Identifying Purposes: Why We Collect Information**

We ask you for information to establish a relationship and serve your medical needs. We obtain most of our information about you directly from you, or from other health practitioners whom you have seen and authorized to disclose to us. You are entitled to know how we use your information and this is described in the Privacy Statement posted at Rapids Family Health Team. We will limit the information we collect to what we need for those purposes, and we will use it only for those purposes. We will obtain your consent if we wish to use your information for any other purpose.

### **3. Consent for the Collection, Use and Disclosure of Personal Health Information**

Rapids Family Health Team requires consent in order to collect, use, or disclose personal health information. However, there are some cases where Rapids Family Health Team may collect, use or disclose personal health information without consent as permitted or required by law. For example, the Rapids Family Health Team does not require consent for using or disclosing information for billing, or quality improvement purposes or to fulfill mandatory reporting obligations.

Rapids Family Health Team assumes that a patient's request for treatment constitutes implied consent for specific purposes, unless expressly instructed otherwise.

If consent is sought by Rapids Family Health Team, a patient may choose not to give consent. If consent is given, a patient may withdraw consent at any time, but the withdrawal cannot be retrospective. The withdrawal may also be subject to legal or contractual restrictions and reasonable notice.

### **4. Limiting Collection of Personal Health Information**

We collect information by fair and lawful means and collect only that information which may be necessary for purposes related to the provision of your medical care.

### **5. Limiting Use, Disclosure and Retention of Personal Health Information**

The information we request from you is used for the purposes defined. We will seek your consent before using the information for purposes beyond the scope of the posted Privacy Statement.

Under no circumstances do we sell patient lists or other personal information to third parties. There are some types of disclosure of your personal health information that may occur as part of this Practice fulfilling its routine obligations and/or practice management. This includes consultants and suppliers to the Practice, on the understanding that they abide by our Privacy Policy, and only to the extent necessary to allow them to provide business services or support to this Practice.

Personal health information shall be retained only as long as necessary to fulfill the stated purposes, and then securely destroyed. Medical records shall be maintained as per CPSO guidelines.

## 6. Accuracy

Rapids Family Health Team shall make reasonable efforts to ensure that personal health information is accurate, complete, and up-to-date as is necessary to fulfill the specified purposes. While we will do our best to base our decisions on accurate information, we rely on you to disclose all material information and to inform us of any relevant changes.

## 7. Safeguards: Protecting Your Information

We protect all forms of information collected from you or on your behalf (verbal, written and electronic) with appropriate safeguards and security measures. Rapids Family Health Team maintains personal information in a combination of paper and electronic files.

We may provide information to health care providers acting on your behalf, on the understanding that they are also bound by law and ethics to safeguard your privacy. RFHT requires anyone who collects, uses or discloses personal health information on our behalf to be aware of the importance of maintaining the confidentiality of personal health information. This is done through the signing of confidentiality agreements, privacy training, and contractual means. RFHT takes steps to ensure that the personal health information we hold is protected against theft, loss and unauthorized use or disclosure.

Our computer systems are password-secured and constructed in such a way that only authorized individuals can access secure systems and databases. Records of personal health information shall be retained, transferred and disposed of in a secure manner or as required by law.

## 8. Openness about Personal Health Information

Information about Rapids Family Health Team's policies and practices relating to the management of personal health information are available to the public, including:

- Contact information for our primary privacy contacts, to whom complaints or inquiries can be made;
- The process for obtaining access to personal health information we hold, and making requests for its correction;
- A description of the type of personal health information we hold, including a general account of our uses and disclosures; and
- A description of how an individual may make a complaint to Rapids Family Health Team or to the Information and Privacy Commissioner of Ontario.

## 9. Patient Access and Correction

Patients may make written requests to have access to their records of personal health information, in accordance with Rapids Family Health Team's policy for access and correction to records. Rapids Family Health Team will respond to a patient's request for access within reasonable timelines and reasonable cost to the patient, as governed by law. RFHT will take reasonable steps to ensure that the requested information is made available in a format that is understandable. If we deny your request for access to your personal information, we will advise you in writing of the reason for the refusal and you may then challenge our decision.

Individuals who successfully demonstrate the inaccuracy or incompleteness of their personal health information may request that we amend their information. In some cases instead of making a correction, individuals may ask to amend a statement of disagreement to their file.

Please Note: In certain situations, Rapids Family Health Team may not be able to provide access to all the personal health information we hold about an individual. Exceptions to the right of access requirement will

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be in accordance with law. Examples may include information that could reasonably be expected to result in a risk of serious harm or the information is subject to legal privilege.

### **10. Challenging Compliance with Rapids Family Health Team Privacy Policies and Practices**

An individual may ask questions or challenge our compliance with this policy or with the Personal Health Information Protection Act, 2004 by contacting our Rapids Family Health Team Privacy Officer.

You can reach us at:

Dr. Luke Winegard, Privacy Officer  
Rapids Family Health Team  
1150 Pontiac Drive, Sarnia, ON, N7S 3A7  
Telephone 519-339-8949

If, after contacting us, you feel that your concerns have not been addressed to your satisfaction, you have the right to complain to the Information and Privacy Commissioner/Ontario. The Commissioner can be reached at:

2 Bloor Street East, Suite 1400  
Toronto, Ontario M4W 1A8  
1-800-387-0073  
[www.ipc.on.ca](http://www.ipc.on.ca)

### **Physicians**

Physicians are not employees of Rapids Family Health Team and are governed by The College of Physicians and Surgeons of Ontario (CPSO).

### **Disclaimer**

Rapids Family Health Team reserves the right to change the terms and information as necessary without notice. You should check the website from time to time for changes. If there is any discrepancy between information posted on our website and the original paper version, the original paper document prevails. As this website is for information purposes only, you should seek appropriate, qualified advice before acting or omitting to act based upon any such information.