

## Privacy Policy

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The North Simcoe Family Health Team (NSFHT) is a community-wide initiative that offers comprehensive primary health care in the Midland area. NSFHT is committed to protecting the privacy of our patients' personal health information, as well as the personal information of our employees.

In order to provide health services to you and plan your care, NSFHT 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.

NSFHT is committed to a high standard of privacy for its information practices. NSFHT complies with applicable privacy legislation, namely, the Personal Health Information Protection Act (PHIPA). While employee personal information is not subject to privacy legislation, NSFHT adopts the ten privacy principles set out in the Canadian Standards Association Model Code for the Protection of Personal Information, for this information, which also form the basis of PHIPA.

### What is Personal Health Information?

Personal health information identifies a specific individual and includes information relating to an individual's physical or mental health, 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 and the records of treatment provided during those visits.

The information contained in the patient's file belongs to the individual and the individual may access the personal health information contained in their record of personal health information. The patient record at the NSFHT offices is the property of the NSFHT. The patient record in their doctor's office is the property of the family physician. At NSFHT, all privacy related enquiries and requests for personal health information are coordinated through our privacy contact.

### What privacy principles guide NSFHT's privacy practices?

NSFHT's privacy practices have been implemented to meet the following goals.

**Accountability:** NSFHT is responsible for the personal health information in its custody and control. The NSFHT Executive Director is responsible for all privacy related policies and procedures and their implementation. When transferring personal health information to third parties, NSFHT shall seek equivalent privacy protection through contractual or other means.

**Consent:** The knowledge and consent of the patient are required for the consent, use or disclosure of personal health information, except as permitted or required by law. The patient may refuse to provide consent or may withdraw their consent at a later time.

**Purposes:** In order to be knowledgeable, NSFHT makes reasonable efforts to ensure that the patient is advised of the purposes for which the information will be collected, used or disclosed. The NSFHT shall communicate the purposes at or before the time the personal health information is collected.

**Limiting Collection of Personal Health Information:** The collection of personal health information must be fair, lawful and limited to that which is necessary for the specified purposes.



**Limiting Use, Disclosure and Retention of Personal Health Information:** NSFHT shall limit the use, retention, and disclosure of personal health information to the relevant purposes identified to the individual, except where otherwise permitted or required by law or by seeking specific consent. Personal health information shall be retained only as long as necessary to fulfill the stated purposes, and then securely destroyed.

**Accuracy:** NSFHT 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.

**Safeguards:** Reasonable steps shall be taken to protect personal health information against theft, loss and unauthorized access, disclosure, copying, modification, disposal or destruction. Records of personal health information shall be retained, transferred and disposed of in a secure manner.

**Openness:** Openness and transparency are key to accountability. Information about NSFHT's policies and practices relating to the management of personal health information shall be made readily available to individuals.

**Access:** Individuals shall be provided access to the personal health information NSFHT holds about them, subject only to limited and specific exceptions. Individuals may request corrections to their personal health information.

**Compliance:** Individuals are encouraged to bring any concerns or issues regarding privacy to the NSFHT Executive Director for discussion and response.

### **Who do we collect personal health information from?**

We collect personal health information directly from you or from a person acting on your behalf. We may also collect personal health information about patients from other sources if we have obtained the patient's consent or if the law permits us to do so.

### **Who do we share your personal information with?**

Personal health information gathered by our team is kept in confidence and access to your personal health information is only provided to those individuals who need to know this information in order to perform their duties or functions.

Unless we are asked not to, personal health information will be shared among the people involved in providing or assisting in the provision of care to the patient. This may include:

- Health care professionals working within NSFHT, including physicians, specialists, nurse practitioners, registered nurses, case managers, social workers, pharmacists, registered dietitians or diabetes educators;
- Other health care professionals working outside of NSFHT who are involved in the provision of health care or treatment to you;
- A hospital or community-based health organization providing health care services to you. With your specific consent, we may also disclose your personal health information to:
- Organizations and individuals who provide other services other than health care to you (i.e. schools, educational staff, group homes, etc.)
- Other individuals whom you identify as contacts, such as family members or friends.
- There may be circumstances where we are required or permitted by law to disclose your personal health information, for example, where personal health information is the subject of



a warrant or court order or subject to mandatory reporting requirements (i.e. communicable diseases or child abuse).

### Why do we use and disclose personal health information?

NSFHT uses and discloses personal health information to:

- provide health care and to communicate with various health care providers including family physicians and/other community agencies/institutions for continuity of care purposes, in order to treat/support and care for patients;
- plan, administer, and manage internal operations, and conduct risk management activities;
- obtain payment and for planning purposes;
- improve quality of service, and compile statistics (e.g., provincial/federal ministries require demographics, information about services provided, how long wait times are for these services, etc.);
- support public health activities – we are required to report information about various diseases to government offices in charge of collecting this information;
- meet legal and regulatory requirements, for example:
- reporting information to coroners in relation to an individual's death;
- reporting communicable and reportable diseases;
- reporting child abuse or neglect fulfill other purposes as required or permitted by law.

### What are your privacy rights?

You or an authorized person on your behalf has the right to:

- Subject to privacy laws, ask us not to share your personal health information with other health care providers, or where you have provided permission to collect, use or disclose personal health information, to withdraw your consent at any time
- Request to see and obtain a copy of your personal health information
- Request changes or corrections to inaccurate or incomplete personal health information
- Be advised if your personal health information is lost, stolen or improperly accessed
- Inquire about how we handle personal information
- Complain if you have concerns about the way we handle your personal health information

### Who else can I contact if I have a privacy complaint?

You have the right to contact the Information and Privacy Commissioner/ Ontario if you have concerns about our privacy practices. The Commissioner can be reached at: 1-800-387-0073 or visit the IPC website at [www.ipc.on.ca](http://www.ipc.on.ca)

### Updating of Privacy Statement

We review and update our privacy practices on a regular basis. NSFHT reserves the right to change the terms of this privacy statement in accordance with applicable laws.