

Privacy Policy

The Kincardine Family Health Team provides comprehensive patient-centred care utilizing an interdisciplinary approach. We are guided by our commitment to excellence and leadership through quality care with a focus on health promotion and disease prevention.

We endeavour to provide residents of the Municipality of Kincardine and Township of Huron-Kinloss access to primary care and to be recognized as a leader in the provision of rural healthcare by providing continuity of care and expanded access to health services.

We are committed to patient privacy and protecting the confidentiality of the health information we maintain. All of us abide by this policy.

Principle 1

Accountability for Personal Health Information

Kincardine Family Health Team is responsible for any personal health information we maintain. We have designated our Chief Executive Officer (CEO) as our Privacy Officer. This position is accountable for compliance with this Policy and compliance with PHIPA. The Kincardine Family Health Team demonstrates our commitment to privacy by implementing privacy policies and procedures to protect the personal health information we hold and by educating our staff and any others who collect, use or disclose personal health information on our behalf about their privacy responsibilities. All staff and those who act on our behalf must abide by PHIPA, this policy and any applicable rules of professional conduct.

Principle 2

Identifying Purposes for Collecting Personal Health Information

Kincardine Family Health Team collects personal health information for purposes related to direct patient care, administration and management of our programs and services, patient billing, administration and management of the health care system, research, teaching, statistical reporting, fundraising, meeting legal obligations and as otherwise permitted or required by law. A patient who presents for treatment gives implied consent for the use of his or her personal health information for authorized purposes, unless expressly instructing otherwise. When personal health information that has been collected and is to be used for a purpose not previously identified, the new purpose will be identified prior to use. We have used the term "***patient***" throughout the policy. It is possible that we hold Personal Health Information (PHI) about individuals who are not patients, and the safeguards in this policy would apply equally to those individuals.

Principle 3

Consent for the Collection, Use and Disclosure of Personal Health Information

Kincardine Family Health Team requires consent in order to collect, use, or disclose personal health information. However, there are some cases whereby we may collect, use or disclose personal health information without consent as permitted or required by law. For example, Kincardine Family Health Team does not require consent for using or

disclosing information for billing, risk management or quality improvement purposes or to fulfill mandatory reporting obligations. Kincardine 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 the Kincardine 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.

Principle 4

Limiting Collection of Personal Health Information

Kincardine Family Health Team limits the amount and type of personal health information we collect to that which is necessary to fulfill the purposes identified. Information is collected directly from the patient, unless the law permits or requires collection from third parties. For example, from time to time we may need to collect information from patients' family members or other health care providers.

Principle 5

Limiting Use, Disclosure and Retention of Personal Health Information

Personal health information will not be used or disclosed by the Kincardine Family Health Team for purposes other than those for which it was collected, except with the consent of the patient or as permitted or required by law. Personal health information will be retained only as long as necessary for the fulfillment of those purposes. Personal health information that is no longer required to fulfill the identified purposes will be destroyed, erased, or made anonymous.

Principle 6

Accuracy of Personal Health Information

Kincardine Family Health Team will take reasonable steps to ensure that information we hold is as accurate, complete, and up to date as is necessary to minimize the possibility that inappropriate information may be used to make a decision about a patient.

Principle 7

Safeguards for Personal Health Information

Kincardine Family Health Team has put in place safeguards for the personal health information we hold, which include:

- Physical safeguards (such as locked filing cabinets and rooms);
- Organizational safeguards (such as permitting access to personal health information by staff on a "need-to-know" basis only); and
- Technological safeguards (such as the use of passwords, encryption, and audits).

Kincardine Family Health Team 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. Kincardine Family Health Team takes steps to ensure that the personal health information we hold is protected against theft, loss and unauthorized use or disclosure. Care is used in the disposal or destruction of personal health information, to prevent unauthorized parties from gaining access to the information.

Principle 8

Openness about Personal Health Information

Information about our policies and practices related to the management of personal health information are available to the public, including:

- Contact information for our Privacy Officer, 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
- A description of how a patient may make a complaint to Kincardine Family Health Team or to the Information and Privacy Commissioner of Ontario.

Principle 9

Patient Access to Personal Health Information

Patients may make written requests to have access to their records of personal health information, in accordance with “**Authorization For Disclosure of Medical Records**”. Kincardine Family Health Team will respond to a patient's request for access within reasonable timelines and costs to the patient, as governed by law. Kincardine Family Health Team will take reasonable steps to ensure that the requested information is made available in a format that is understandable. Patients 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, patients may ask to append a statement of disagreement to their file.

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

Principle 10

Challenging Compliance with Kincardine FHT Privacy Policies and Practices

Any person may ask questions or challenge our compliance with this policy or with PHIPA by contacting our Privacy Officer. Kincardine Family Health Team will receive and respond to complaints or inquiries about our policies and practices relating to the handling of

personal health information. We will inform patients who make inquiries or lodge complaints of other available complaint procedures. Kincardine Family Health Team will investigate all complaints. If a complaint is found to be justified, Kincardine Family Health Team will take appropriate measures to respond.

**Kincardine Family Health Team
1201 Queen Street
Kincardine, ON N2Z 3C1
Tel.: 519.396.2700
ATTENTION: Privacy Officer**

The Information and Privacy Commissioner of Ontario oversees compliance with privacy rules and PHIPA. Any individual can make an inquiry or complaint directly to the Information and Privacy Commissioner of Ontario by writing to or calling:

**Information and Privacy Commissioner of Ontario
2 Bloor Street East
Suite 1400
Toronto, ON M4W 1A8
Phone: 1 (800) 387-0073**