

Privacy Policy
Of
Lisa Smith, RMT

The following is the privacy policy of the clinic of Lisa Smith, RMT:

THE PLEDGE REGARDING YOUR HEALTH INFORMATION

It is our understanding that health information about you and your healthcare is personal and private. We are committed to protecting health information about you. A record of your care and services that you receive from us will be created. This is done to provide you with quality care and to comply with any legal and regulatory requirements.

This policy will describe your rights to the health information that is kept about you and describe certain obligations we have regarding the use and disclosure of your health information. This policy also describes your rights to the health information we keep about you, and describes certain obligations we have regarding the use of and disclosure of your health information.

Our policy regarding your health information is backed-up by Federal Law. The privacy and security provisions are part of the *Personal Information Protection and Electronic Documents Act (PIPEDA)* and *Personal Health Information Protection Act, 2004 (PHIPA)*.

Our commitment to your privacy and the confidentiality of personal health information is demonstrated by:

1. Accountability for Personal Health Information

- Implementing policies and procedures to protect personal health information.
- Educating anyone who collects uses or discloses personal health information on the clinic's behalf about their responsibilities under the clinic's privacy policy.
- Implementing policies and procedures through the Privacy Office to:
 - Receive and respond to complaints
 - Field enquiries on privacy related matters, and
 - Make material on the clinic's privacy policies and procedures publicly available.
 - Reviewing the privacy policy on an annual basis.

2. Identifying Purposes for Which Personal Health Information is Being Collected.

- The clinic collects personal health information for purposes related directly to patient / client care, administration and management of the clinic practice and services it provides, patient / client billing or as required by law.
- Client files may be periodically shown to a member of the College of Massage Therapists of Ontario for purposes of quality assurance only as required by the College of Massage Therapist's of Ontario, whom the proprietor of the clinic is a member thereof.
- When use of the patient / client's health information that has been collected is to be used for a purpose not previously identified, the new purpose will be

identified. Unless the new purpose is permitted or required by law, consent is required before the information can be used for that purpose.

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

- The clinic will generally rely on implied consent from our clients or their legally authorized representative for the collection, use, or disclosure of Personal Health Information (PHI). In some circumstances, the clinic will obtain express consent to collect, use or disclose PHI as required by the clinic's policy. In any case, the Clinic will collect, use or disclose PHI as permitted or required by law. The clinic may disclose PHI as required by law without consent.
- An individual may withdraw consent at any time, but the withdrawal of the consent cannot be retroactive. The withdrawal may also be subject to legal or contractual restrictions and reasonable notice.

4. Limiting Collection of Personal Health Information

- The clinic limits the amount and type of personal health information it collects to that which is necessary to fulfill the purposes identified. Information is collected directly from the individual, unless the law permits or requires collection from third parties.

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

- The clinic uses and discloses PHI for purposes related directly to patient / client care, administration and management of the clinic practice and services it provides, patient / client billing or as required by law.
- Personal health information will be retained in accordance with the law and regulations of the College of Massage Therapists of Ontario for no less than 10 years or 10 years after a minor has turned 18.
- Once the requirements of the law have been met, the personal health information will be destroyed, erased or made anonymous.

6. Accuracy of Personal Health Information

- To the extent reasonably possible, personal health information will be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.
- The clinic is required by the proprietor's regulating body to ensure a patient / client's personal health information is updated annually.
- A request may be made by a patient / client to make a correction to his/her health record.
 - The clinic must correct the record where the individual demonstrates that the record is incomplete or inaccurate for the purposes for which the clinic uses the record (without changing or erasing the original entry) unless an exception applies in the circumstances.

- The clinic is not required to correct a professional opinion or observation made in good faith.
- Where the clinic has refused to make a correction, the clinic must inform the individual of the refusal, provide reason and inform of right to appeal the refusal or the right to attach a statement of disagreement.

7. Safeguards for Personal Health Information

- The clinic has implemented security safeguards for the personal health information it holds, which include:
 - Physical measures (locked file cabinets)
 - Organizational measures (such as permitting access on a “need-to-know” basis only) and,
 - Technological measures (use of passwords, etc.)
- The clinic requires anyone who collects, uses, or discloses personal health information on its 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.
- The clinic has taken steps to ensure that the personal health information in its custody and control is protected against theft, loss and unauthorized use and disclosure.
- Care is used in the disposal or destruction of personal health information, to prevent unauthorized parties from gaining access to the information.

8. Openness About Personal Health Information Policies and Practices

- Information about the Clinic’s policies and practices relating to the management of personal health information are available, including:
 - Contact Person to whom complaints or inquiries can be made.
 - The process for obtaining access to personal health information held by the clinic, and making requests for its correction;
 - A description of the type of personal health information held by the clinic, including a general account of its use and disclosures;
 - A copy of any brochures or other information that explains the clinics privacy policies, standards, or codes.

9. Individual Access to Personal Health Information

- Individuals may make written requests to have access to their records of personal health information, in accordance with the clinic’s policy for access and correction to records.
- The clinic will respond to an individual’s request within 30 days and costs to the individual, as governed by legislation. The clinic will take reasonable steps to ensure that the requested information is made available in a form that is understandable.
- Individuals who successfully demonstrate the inaccuracy or incompleteness of their personal health information may request that the clinic amend their

information. This will be done in accordance with the clinic's access and correction to records.

10. Challenging Compliance with the Clinic's Privacy Policies and Practices

- An individual may address a challenge concerning compliance with this policy at (705) 735-2910 and ask for Lisa Smith or email at: lisa_smith@rogers.com
- The clinic will receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal health information. It will inform individuals who make inquiries or lodge complaints of other available complaint procedures.
- If the individual is not satisfied with the decision or action of the contact person, the individual can process their complaint to:

The Information and Privacy Commissioner of Ontario

2 Bloor Street East, Suite 1400

Toronto, ON M4W 1A8

Tel: 416-326-3333 or 1-800-387-0073

Fax: 416-325-9195