

<b>Huron Perth Healthcare Alliance</b>	
<b>Privacy, Communication &amp; Freedom of Information</b>	Original Issue Date: October 01, 2004
<b>Privacy Policy</b>	Review/Effective Date: April 01, 2019
<b>Approved By: President &amp; CEO</b>	Next Review Date: April 01, 2021

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As a provider of healthcare services, the Huron Perth Healthcare Alliance collects, uses, discloses, retains and protects personal health information.

Personal Health Information is defined as information, oral or recorded, about an individual that does or could identify that individual and that:

- relates to physical or mental health
- includes family history as it is reflected in record of personal health information
- identifies the healthcare provider
- relates to payments or eligibility for healthcare
- relates to donation of body part or bodily substance
- includes the health number (replaces *Health Cards and Numbers Control Act*)
- identifies Substitute Decision Maker
- includes any non-health info that is in record that is identifying

We recognize the importance of privacy and the sensitivity of personal health information and we are committed to protecting all personal health information in our custody and control.

This policy reflects the ten internationally recognized privacy principles which have been adopted by Ontario's *Personal Health Information Protection Act (2004)* and the Canadian Standards Association's Model Code for the Protection of Personal Information.

#### **Accountability**

The Chief Privacy Officer is responsible for ensuring that the Huron Perth Healthcare Alliance has a comprehensive framework for the protection of personal health information and to address general privacy concerns. To contact the Huron Perth Healthcare Alliance's Chief Privacy Officer:

Ken Haworth, Chief Privacy Officer  
 46 General Hospital Drive Stratford, ON, N5A 2Y6  
 Phone (519) 272-8210 ext 2736  
 Email: [alliance.privacyoffice@hpha.ca](mailto:alliance.privacyoffice@hpha.ca)  
 website: [www.hpha.ca](http://www.hpha.ca)

#### **Identifying Purposes**

Personal health information is collected, used or disclosed to:

- communicate and facilitate care with your various health care providers within HPHA, the region and province.
- request payment for treatment and care (from OHIP, WSIB, private insurers or others),
- plan, administer and manage our internal operations, and conduct risk management activities,
- conduct quality improvement activities (such as sending patient satisfaction surveys),
- teach, conduct research, and compile statistics, and
- comply with legal and regulatory requirements, and fulfill other purposes permitted or required by law.

The Huron Perth Healthcare Alliance, comprised of hospitals in Stratford, Seaforth, St. Marys & Clinton and affiliated with Alexandra Marine & General Hospital in Goderich, shares a common computer system amongst these hospitals. The Huron Perth Healthcare Alliance also participates in additional health information sharing initiatives with other healthcare providers. If patients have been treated or sought treatment at any of these hospitals, only those staff or physicians that need to know patient personal health information will access this for direct care or administrative purposes.

#### **Consent**

We rely on implied consent, where appropriate, or obtain express consent from patients when collecting, using or disclosing their personal health information. Express consent may be verbal, in writing or by electronic means.

A patient may withdraw or limit consent at any time, unless doing so prevents us from recording the personal health information required by law or professional standards.

Unless patients tell us not to, we disclose personal health information to other health care providers in the "Circle of Care" who need to know this information to provide or help to provide care. The "Circle of Care" includes health care professionals, pharmacies, laboratories, ambulance, nursing homes, Community Care Access Centres, home service providers and others who provide health care services.

Unless patients tell us not to, we may tell anyone who calls or visits the hospital, the patient's location, phone extension (if applicable) and basic health condition.

If personal health information about an individual is disclosed and we do not have the consent of the individual to disclose all the personal health information considered reasonably necessary for the purpose of the disclosure, we inform the person of that fact.

An individual is presumed to be capable of giving consent to the collection, use or disclosure of personal health information, regardless of age. If we determine an individual is incapable of providing this consent the provisions in the Personal Health Information Protection Act for substitute decision-making are followed.

### **Limiting Collection**

We limit the collection of personal health information to that which is necessary for the above identified purposes or for purposes that the Personal Health Information Protection Act permits or requires.

### **Limiting Use, Disclosure and Retention**

Personal health information is not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as permitted or required by law.

Personal health information is retained for as long as we are required to, or necessary for the fulfillment of the above identified purposes, or longer depending on our ability to store the information. Personal health information is disposed of in a secure and confidential manner.

### **Accuracy**

We take reasonable steps to ensure that personal health information is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

### **Safeguards**

Personal health information is protected by various methods which are in keeping with industry standards and are designed to protect personal health information against loss, theft, unauthorized access, disclosure, copying, use or modification.

The methods of protection may include:

- **Physical measures**, for example, locked filing cabinets, restricted access to offices
- **Administrative measures**, for example, limiting access on a "need-to-know" basis, storing personal health information on the secure network rather than on computer hard drives, laptop computers, portable storage devices or personal device assistants
- **Technical measures**, for example, the use of passwords, auto-logging off the system when a session is finished or after a period of inactivity, and audits on the electronic patient record system.

Individuals are informed when their personal health information has been breached as appropriate.

### **Openness**

We provide written statements of our information practices as outlined in this policy and [Public Notice 2015](#) that are posted throughout the Huron Perth Healthcare Alliance. We provide specific information about our policies and practices related to the management of personal health information upon request to the Chief Privacy Officer.

### **Individual Access**

Upon request, we inform an individual of the existence, use, and disclosure of his or her personal health information. We give the individual access to that information, as permitted, and charge a reasonable fee as indicated in the *Personal Health Information Protection Act*.

An individual may request a copy of their personal health information by downloading and submitting a [Request For Access To Personal Health Information](#) form to the Health Information Services office at each hospital within the Alliance. The [Request for Access to Personal Health Information](#) form can also be downloaded from the Huron Perth Healthcare Alliance website ([www.hpha.ca](http://www.hpha.ca)) or provided upon request to Health Information Services.

An individual is able to challenge the accuracy and completeness of their personal health information by contacting Health Information Services.

### **Challenging Compliance**

An individual is able to challenge our privacy practices by contacting the Chief Privacy Officer.