

Huron Perth Healthcare Alliance	
Privacy, Communication & Freedom of Information	Original Issue Date: October 01, 2004
Privacy Policy	Review/Effective Date: September 26, 2024
Approved By: President & CEO	Next Review Date: September 26, 2026

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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 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.

The Huron Perth Healthcare Alliance's Chief Privacy Officer may be contacted at:

Chief Privacy Officer
46 General Hospital Drive Stratford, ON, N5A 2Y6
Phone (519) 272-8210 ext.2736
Email: alliance.privacyoffice@hpha.ca
website: 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
- Provide appointment or preventative care reminders to you and update you of upcoming events, activities and programs
- Coordinate your care with your health care providers including through shared electronic health information systems such as Ontario Health Teams, Ontario Laboratory Information Systems (OLIS), Connecting Ontario and local, regional and provincial programs
- Be paid or process, monitor, verify or reimburse claims for payment
- Plan, administer and manage our programs and conduct quality and risk management activities
- Conduct Patient Experience Surveys
- teach, conduct research, and compile statistics
- allow for the analysis, administration and management of the health system
- Comply with legal and regulatory requirements; fulfill other purposes permitted or required by law
- Educate our staff, care providers and students
- Dispose of your information responsibly

*The four hospitals of HPHA; Clinton Public Hospital, Seaforth Community Hospital, St. Marys Memorial Hospital, and Stratford General Hospital and in partnership with Alexandra Marine & General Hospital in Goderich share a common computer system. If you have been treated or seek treatment at any of these hospitals, only staff or physicians required to access your personal health information for direct care or administrative purposes are authorized to access your computerized clinical records.

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, retirement homes, long term care homes, home and community care services providers and others who provide health care services.

- 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, double authentication, encryption of devices, 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 when indicated.

Openness

We provide written statements of our information practices as outlined in this policy and public notices [Public Privacy Notice - 2021](#) 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 their 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 the [Request For Access To Personal Health Information](#) form from the Huron Perth Healthcare Alliance website (www.hpha.ca) and submitting to the Health Records Department of the appropriate hospital site within the Alliance. Paper copies of the request form are available by contacting the Health Records Department of the appropriate hospital site within the Alliance.

An individual is able to challenge the accuracy and completeness of their personal health information by contacting Health Records Department of the appropriate hospital site within the Alliance.

Privacy Concerns or Complaints

An individual is able to voice their privacy concerns or lodge a complaint by contacting the HPHA Information & Privacy Office - alliance.privacyoffice@hpha.ca, by calling (519) 272-8210 ext. 2736 or visiting the Huron Perth Healthcare Alliance web site at <http://www.hpha.ca>. All enquiries are kept strictly confidential. If individuals feel that their concerns have not been addressed, they have the right to make a complaint to the Information & Privacy Commissioner of Ontario at:

**2 Bloor Street East, Suite 1400
Toronto, Ontario – M4W 1A8
1-800-387-0073**

Or visit the IPC Website via www.ipc.on.ca