

Integrated Rehab Professional's (IRP)

Privacy Policy:

The Therapists and Office Staff at Integrated Rehab Professionals are committed to protecting your personal information.

Privacy Rules and Acts that affect Integrated Rehab Professionals:

Integrated Rehab Professionals provides health care services – Physiotherapy, Occupational Therapy and Social Work and Dietitian services - and is responsible for the Personal Information under its control. Integrated Rehab Professionals has developed a Privacy Policy and has appointed a Privacy Officer to ensure that we comply with this Privacy Policy and all applicable privacy legislation affecting our use of your Personal Health Information. “Personal Information” means information that specifically identifies a client or patient and is provided to, or collected by Integrated Rehab Professionals in connection with providing health care services. IRP engages in commercial activity and is governed by PIPEDA, Personal Information Protection and Electronics Document Act.

Personal Information that Integrated Rehab Professionals collects uses and discloses may include, without limitation, a client's name, age, contact information including a relative, neighbour, friend or a Power of Attorney for personal care, substitute decision maker, health benefit information, occupational information, Personal Health information and other information that Integrated Rehab Professionals deems necessary to fulfil its stated purposes as outlined below. It can be oral or written information about an individual if used for the purposes related below.

Purposes:

Integrated Rehab Professionals collects, uses, and discloses personal information for the following purposes:

- To make decisions about the types of services you need.
- To provide assessment and treatment services and the best care possible for clients/patients
- To provide progress reports/assessment findings resulting from services provided to clients/patients.
- To serve as a means of communication to other Service Providers.
- To monitor the provision of services and evaluate your response to services provided
- To invoice for services rendered
- To determine best clinical practices, and ensure quality of service by Service Provider Personnel and to measure our quality of care
- To analyze for research purposes and for education purposes
- To allow Integrated Rehab Professionals to meet our regulatory obligations. The Colleges of Physiotherapy, Occupational Therapy and Social Work and Dietitian may audit our records as a part of their regulatory activities in the public interest.
- To store information on behalf of Service Provider Personnel and the LHIN / OHT.
- To comply with audit and inspection rights of the LHIN / OHT and the delivery of client records to the LHIN and OHT if requested.
- To be a part of a health record of a client/patient

- Personal Health Information is shared with Case Managers, other health care Professionals, Office staff, Doctors, funding agency staff and other agency staff involved in client/patient care.
- It may be used to provide information to third party payers (e.g. LHIN / OHT) when they pay for the services you receive from us.
- Personal Health Information may include a detailed medical history or a copy of a medical file / referral from the LHIN / OHT that is reviewed for the purpose of completing Integrated Rehab Professionals' services.

Integrated Rehab Professionals uses, shares and discloses Personal Information in order to fulfil the purposes above noted or where otherwise permitted by law.

Protecting Personal Health Information:

We understand the importance of protecting personal information. For that reason, we have taken organizational, physical and technological measures to ensure that your information remains secure. Our staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy. External consultants must enter into privacy agreements with us.

For our clients/patients:

You may request to see your personal health information

You may ask for and receive a copy of your health record.

You may ask Integrated Rehab Professionals to correct your record.

Your Health Information is private. Unless sharing it with others is authorized by law, Integrated Rehab Professionals cannot and will not give out any of your personal information without your consent.

Integrated Rehab Professionals strives to ensure that personal information is as accurate as possible and that Integrated Rehab Professionals has in place security safeguards designed to protect against loss, theft or unauthorized access or disclosure of Personal Information.

You may make a complaint to our Privacy Officer about access to your personal information, or about how it is collected, used, stored, and disclosed. Ask the Service Provider who is caring for you, or contact our Privacy Officer.

- Privacy Officer, Angela Dye, at (905) 839-5248 or 1-888-462-4849.
1867 Valley Farm Road, Pickering, Ontario L1V 3Y7

Integrated Rehab Professionals reserves the right to amend this Privacy Policy at any time as needed.

You may direct any questions about Personal Information or Integrated Rehab Professionals privacy policy to the Privacy Officer.

You may request Integrated Rehab Professionals' Privacy Officer to allow you to review your Personal Information and that you may contact the Privacy Officer to challenge Integrated Rehab Professionals' compliance with its Privacy Policy and applicable Privacy Legislation.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. She will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

If you have a concern about the professionalism or competence of our services of any of our professional staff, we would ask you to discuss those concerns with us. However, if we cannot satisfy your concerns, you are entitled to complain to our regulatory colleges.

College of Physiotherapy of Ontario: 416-591-3828	375 University Ave. Toronto
College of Occupational Therapy of Ontario 416-214-1177	20 Bay Street, Toronto
College of Social Workers of Ontario 416-972-9882	250 Bloor St. E. Suite 1000, Toronto
College of Dietitians of Ontario: 416-598-0274	5775 Yonge St. Suite 1810 Box 30 Toronto

Information and Privacy Commissioner of Ontario: 416-326-3333 2 Bloor St. E. Suite 1400 Toronto

Disclosure of Personal Health Information:

IRP can disclose your personal health information without your consent in the following circumstances:

- to other practitioners or facilities for the provision of health care
- confirming the presence, location and general health status of a client in a facility so long as the client has not objected when offered an opportunity to do so
- for audit or accreditation purposes
- to address a significant risk of serious bodily harm to another person or group
- in some health planning and management purposes
- to assist in the monitoring of public health funding

However, if a custodian discloses to a non-custodian (such as employers and lawyers), the individual's consent must be express. This means, for example, that the disclosure of personal health information by a custodian to an insurance company must be authorized by express consent of the individual.

Similarly, if a custodian discloses personal health information to another custodian for a purpose other than providing health care, consent must be express (written or verbal).

Retention and Destruction of Personal Information:

The Colleges of Ontario (PT, O.T., SW., and RD) requires that we retain client records for 10 years past the last visit or in the case of a child, for 10 years past the child's 18th birthday. We destroy our files within three months of that time. We use secure destruction methods and obtain a certificate of destruction. We follow the secure destruction methods of media and electronic information.

For Your Information:

Definitions:

Health Information Custodian:

Health Care Custodian means a person or organization who has custody or control of personal health information as a result of or in connection with performing the person's or organization's powers or duties of the work as follows: for example, health care practitioners or a person who operates a group practice of health care practitioners, long-term care service providers who provide a community service, community care access corporations, hospitals, pharmacies, laboratories, ambulance service, an evaluator or an assessor, a person who operates public or private hospitals or a psychiatric facility, facilities a medical officer of health, or a board of health, the Ministry of Health and Long Term Care and others specifically included in the definition.

Agent:

In relation to a health information custodian, means a person who, with the authorization of the custodian, acts for or on behalf of the custodian in respect of personal health information for the purposes of the custodian, and not the agent's own purposes, whether or not the agent is employed by the custodian and whether or not the agent is being remunerated.

Health Care Practitioner:

- A person who is a member within the meaning of the Regulated Health Professions Act and who provides health care.
- A person who is registered as a drugless practitioner under the Drugless Practitioners Act
- A person who is a member of the Ontario College of Social Workers and who provides health care
- Any other person whose primary function is to provide health care for payment.

Personal Health Information:

Identifying information about an individual in oral or recorded form, if the information:

- Relates to the physical or mental health of the individual, including information that consists of the medical history of the individual's family
- Relates to the providing of health care to the individual, including the identification of a person as a provider of health care to the individual
- Is a plan of service within the meaning of the Long-Term Care Act, 1994 for the individual
- Relates to payments or eligibility for health care in respect of the individual
- Is the individual's health number
- Identifies an individual's substitute decision-maker

Capable:

Means mentally capable and "capacity" has a corresponding meaning.

Consent:

Consent may be express or implied. When a custodian discloses personal health information to another custodian for the purpose of providing health care, the consent of the individual may be implied, unless the individual has specifically withheld or withdrawn the consent. If the purpose of the disclosure is not to provide health care, consent must be express. Consent for disclosures to third parties that are not custodians must be express.

Whether it is express or implied, consent must be knowledgeable. This means that the individual must know the purpose of the collection, use or disclosure and that consent may be provided or withheld.

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

Consent is a basic requirement for the collection, use and disclosure under the current privacy act, subject to limited exceptions. To be valid, consent must be knowledgeable, voluntary, related to the personal health information in question, not obtained by deception or coercion, and given by the individual concerned.

Consent may be express (verbal or written) or implied. Generally, custodians /agents (Integrated Rehab Professionals) are engaged in the provision of direct health care may rely on the individual's implied consent for the collection, use and disclosure of personal health information for the purpose of providing the health care where it is reasonable to assume that the individual knows the purpose of the collection, use or disclosure and their right to give or withhold consent.

Below is the current consent and notice form of IRP. If you need this form in an alternate format, for example a client who may need it written in Braille, then this form can be used in your alternate software to promote better understanding.

PLEASE SEE NOTICE AND CONSENT OF INTEGRATED REHAB PROFESSIONALS ON NEXT PAGE:



Notice - Consent to Release and Treat

Integrated Rehab Professionals (IRP) provides you with a broad variety of care services. To meet your needs and serve you well, Integrated Rehab Professionals needs to know personal information about you.

You, as an individual, have a right to know how we collect, use and disclose personal information. You have the right to expect that, to the best of our ability, your personal information held by us, remains accurate, confidential and secure.

Integrated Rehab Professionals is proud of its long-standing commitment to maintaining the confidentiality and security of personal information and has implemented practices to better protect the privacy of your personal information.

Integrated Rehab Professionals collects, uses, discloses and stores facts about you and your health.

The facts are collected to help provide healthcare or payments for health care. They include: Your name, address and your Ontario Health Card Number, facts about your health, health care history and the health care that you have been given.

We use this information and share it only with those who need to know that information.

For instance, we might use it:

- *To make decisions about the types of services you need*
- *To serve as a means to communicate to other Service Providers.*
- *To monitor the provision of services and evaluate your response to services provided*
- *For administration, management, strategic planning, decision-making, research, allocating of resources within the organization and other purposes set out in the IRP Brochure.*
- *To meet legal and regulatory requirements.*
- *IRP may be required to comply with audit and inspection rights of the CCAC and the delivery of client records to the CCAC if requested.*

These are your rights:

- *You may see or have access to your personal health information.*
- *You may ask for and receive any copy of your health record.*
- *You may ask us to correct your records*
- *Your personal information is private. Unless sharing it with others is authorized by law, we cannot and will not give out any of your personal information without your consent.*
- *You may make a complaint to our Privacy Officer about access to your personal information, or about how it is collected, used, stored, and disclosed. Ask the staff that is caring for you, or contact Angela Dye, Privacy Officer at 905-839-5248 Ext. 224.*

CONSENT

I, _____ have reviewed the above summary of information relating to Integrated Rehab Professionals Privacy Policy. I have had an opportunity to have questions answered regarding this Notice and feel that I have a reasonable understanding of the Notice. I hereby authorize the collection, use and disclosure of my personal information by IRP in order to facilitate the provision of care and service to myself and for specific, related purposes as detailed within this Notice.

Client Name: _____ OHIP or DOB: _____ Date: _____

X Client Signature: _____

Client is unable to sign, Name of Substitute Decision Maker (SDM):

Relationship: _____ Signature of SDM:

Name of Witness to SDM: _____ Signature of Witness:

The CCAC is the Health information custodian under PHIPA (Personal Health Information Protection Act) and Integrated Rehab Professionals is the agent of the CCAC. IRP carries out all responsibilities regarding Client information and Client records of a health information custodian on behalf of the CCAC in accordance with PHIPA. Service Provider Personnel are the Agents of Integrated Rehab Professionals.