



## **PRIVACY POLICY**

Prime Care Family Health Team is a health custodian under the *Personal Health Information Protection Act, 2004*. As a team of family physicians, allied health professionals and administrative staff, we are bound by the protection of personal health information through this act.

### **Principle 1 – Accountability for Personal Health Information**

Prime Care Family Health Team is responsible for the protection of all patient information collected by any member of staff. We abide by the regulations set out in the PHIPA Act, and strictly follow policies and procedures to ensure patient data is kept safe and confidential. All new members of staff are notified of our policy and must agree to all terms and conditions.

Each Prime Care Physician is their own HEALTH INFORMATION CUSTODIAN and is responsible for ensuring all policies and procedures are followed with respect to privacy of patient health information.

### **Principle 2 – Identifying Purposes for Collecting Personal Health Information**

Prime Care FHT will collect personal health information only when it pertains to the direct care of the patient. Personal information will be collected without consent only if required by the law.

The main purposes that Prime Care FHT collects personal health information are under the following circumstances: for direct patient care, wellness programming, administrative purposes, billing, data collection/maintenance, quality improvement and research.

### **Principle 3 – Consent for the Collection, Use and Disclosure of Personal Health Information**

When a patient seeks treatment under our umbrella of care, it is implied that he/she has given consent for personal health information to be collected. For the purposes of billing and quality improvement initiatives, consent is not required from the patient.

If medical reasoning or the law require Prime Care FHT to collect medical information, this may be done so without patient consent.

### **Principle 4 – Limiting Collection of Personal Health Information**

Prime Care FHT will not collect personal health information unless it directly relates to patient care, or as required by law, thereby limiting the collection of personal health information

### **Principle 5 – Limiting Use, Disclosure and Retention of Personal Health Information**

Unless consent is given, or the law requires us to use personal health information without consent, personal health information will be used solely for the purposes in which it was collected for. When

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## FAMILY HEALTH TEAM

personal health information is no longer needed, it will be destroyed in a manner in which it cannot be reconstructed.

### **Principle 6 – Accuracy of Personal Health Information**

Prime Care FHT will ensure personal health information is collected, utilized and maintained in an accurate manner, to eliminate any misunderstanding or misdiagnosis in relation to an individual's health care.

### **Principle 7 – Safeguards for Personal Health Information**

Prime Care FHT has various safeguards for personal health information that has been collected. These safeguards include technological safeguards (such as passwords and encryption) and physical safeguards (such as locked filing cabinets and key access to office entrances).

All members of staff are required to sign a confidentiality agreement before given access to personal health information.

Any personal health information that is disposed of will be disposed in such a manner that the original copy will in no way be able to be reconstructed.

Failure to comply with such safeguards can result in the termination of the employee and potential loss of licenses and accreditations.

### **Principle 8 – Openness about Personal Health Information**

The policies and procedures that align with personal health information are made public, and can be discussed further with Prime Care Family Health Team's Executive Director.

If you would like more information about the policies and procedures, or would like to submit a complaint about how your personal health information has been handled, please contact our Executive Director.

### **Principle 9 – Individual Access to Personal Health Information**

Patients may submit a request to have access to personal health information. It is not guaranteed that the request will be granted, and will be based upon the policies and procedures surrounding this request.

Once a request is submitted, any necessary actions will follow in a timely manner, to ensure the patient request has been thoroughly dealt with and is understood by all parties involved.



**Principle 10 – Challenging Compliance with Prime Care FHT Privacy Practices and Policies**

Patients have the right to challenge what they feel has been in compliance with the FHT privacy practices and policies. Any challenges will be directed to our Administrator, after which the challenge will be dealt with accordingly.