

Perth Medical Clinic Privacy Notice

We are committed to promoting privacy, protecting the confidentiality of the health information we hold, and being transparent about how we collect, use, and disclose personal health information.

Our physicians are individually health information custodians under the *Personal Health Information Protection Act, 2004* (PHIPA). For the purposes of privacy obligations, the Perth Family Health Team is a PHIPA agent to each physician for joint patients. The Perth Family Health Team is the custodian of records for its own patients who do not have a Perth Family Health Organization physician. We all follow the same rules and work together to protect your privacy.

YOUR HEALTH RECORD

Your health record includes information relevant to your health including your date of birth, contact information, health history, family health history, details of your physical and mental health, record of your visits, the care and support you received during those visits, results from tests and procedures, and information from other health care providers.

Your record is our property, but the information belongs to you.

With limited exceptions, you have the right to access the health information we hold about you, whether in the health record or elsewhere.

You can request a copy of your record. If you need a copy of your health record, please contact us in writing at: **Perth Medical Clinic, 14 Isabella St, Perth, ON K7H 2W6**, or ask your physician or other health care provider who will explain the process. We will help you identify relevant records and help you understand the content of those records (e.g. by explaining acronyms and simplifying technical language). In rare situations, you may be denied access to some or all of your record (with any such denial being in accordance with applicable law). We may charge you a fee for access to cover our reasonable cost recovery; if we do so, we will provide you with a fee estimate ahead of time.

We try to keep your record accurate and up to date. Please let us know if you disagree with what is recorded, and we may be able to make the change (unless the record reflects our professional opinions made in good faith), or otherwise we will ask you to write a statement of disagreement and we will attach that statement to your record.

CONFIDENTIALITY

Everyone here is bound by confidentiality. We must protect your information from loss or theft and make sure no one looks at it or does something with your information if they are not involved with your care or allowed as part of their job. If there is a privacy breach, we will tell you (and we are required by law to tell you).

OUR PRACTICES

We collect, use, and disclose (meaning share) your health information to:

- Treat and care for you
- Provide appointment or preventative care reminders to you and/or send patient surveys to you
- Update you of upcoming events, activities and programs
- Coordinate your care with your other health care providers including through shared electronic health information systems such as Ontario Laboratory Information Systems (OLIS), HealthLinks, Connecting Ontario, and local, regional and provincial programs
- Deliver and evaluate our programs
- Plan, administer and manage our internal operations
- Be paid or process, monitor, verify or reimburse claims for payment
- Conduct risk management, error management and quality improvement activities
- Educate our staff and students
- Dispose of your information
- Seek your consent (or consent of a substitute decision-maker) where appropriate
- Respond to or initiate proceedings
- Conduct research (subject to certain rules)
- 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

Our collection, use and disclosure (sharing) of your personal health information is done in accordance with Ontario law. When we hire technology vendors to help us, we ensure our contracts follow PHIPA.

We use provincially recommended tools for integrated care, such as eReferral Ontario, through which Ontario Health may collect data, including personal health information. As a Prescribed Entity under PHIPA, Ontario Health is permitted to collect personal health information for the management and planning of the health care system.

YOUR CHOICES

You have a right to make choices and control how your health information is collected, used, and disclosed, subject to some limits.

We assume that when you come to receive health care from us, you have given us your permission (your consent) to use your information, unless you tell us otherwise. We may also collect, use, and share your health information in order to talk with other health care providers about your care unless you tell us you do not want us to do so.

Before we connect with you by virtual meeting or use an artificial intelligence (AI) scribe to assist with notetaking and documentation of our encounters with you, we will explain what that means and seek your consent.

There are cases where we are not allowed to assume we have your permission to share information. We may need permission to communicate with any family members or friends with whom you would like us to share information about your health (unless someone is your substitute decision-maker). We will need your permission to give your health information to your school or your boss or to an insurance company. If you have questions, we can explain this to you.

When we require and ask for your permission, you may choose to say no. If you say yes, you may change your mind at any time. Once you say no, we will no longer share your information, use virtual visits, or use an AI scribe unless you say so. Your choice to say no in relation to sharing of information may be subject to some limits.

But there are some circumstances when we may collect, use, or share your health information without your permission, as permitted or required by law. For example, we do not require your permission to use your information for billing, risk management or error management, or quality improvement purposes. We also do not need your permission to share your health information to keep you or someone else safe (to eliminate or reduce a significant risk of serious bodily harm); or to meet reporting obligations under other laws such as for health protection of communicable diseases, child safety, or safe driving.

CONSENT DIRECTIVE – LOCKBOX

You have the right to ask that we not share some or all of your health record with one or more of our team members or ask us not to share your health record with one or more of your external health care providers (such as a specialist). This is known as asking for a “lockbox”. If you would like to know more, please ask us for a copy of our “**Patient Lockbox Information Brochure: How to Restrict Access to your Health Record**”. If you request restrictions on the use of and disclosure of your health record, a member of our team will explain your choices and potential repercussions for those options.

WHO DECIDES

You may make your own decisions if you are “capable”. Your health care provider will decide if you are capable based on a test the law sets out. You may be capable of making some decisions and not others. If you are not capable – you will have a substitute decision-maker who will make your information decisions for you. Who can act as a substitute decision-maker and what they have to do is also set out in law.

For children, there is no magic age when you become able to make your own decisions about your health information. If you are capable, you make your own decisions. However, if you are under the age of 16, there are some additional rules to know:

If you are under the age of 16, your parent(s) or guardian will also be allowed to make some decisions about your health record. But they won’t be able to make

decisions about any records about treatment or counseling where we asked for your permission alone.

We encourage you to share information with your family and other caregivers to have supports you need. We also encourage you to ask your health care provider questions to find out more about privacy and your family and caregivers.

FOR MORE INFORMATION OR COMPLAINTS

If you would like a copy of our Privacy Policy, please contact our Privacy Officer. We encourage you to contact us with any questions or concerns you might have about our privacy practices. You can reach the Privacy Officer at:

Executive Director
Perth Family Health Team
14 Isabella Street, 2nd Floor
Perth Ontario K7H 2W6
613-515-2680
privacy@perthfht.ca

If, after contacting us, you feel that your concerns have not been addressed to your satisfaction, you have the right to complain to the Information and Privacy Commissioner of Ontario. The Commissioner can be reached at:

Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto, Ontario M4W 1A8
1-800-387-0073
or visit the IPC website via www.ipc.on.ca