

Community Care Clinic Ltd.

Privacy Charter

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Approved By: Dr. Ravi Seyed-Mahmoud

Introduction

We have adopted this Privacy Charter to guide how our clinic collects, uses and discloses health information.

Health Information

Our clinic respects the privacy rights of our patients and is committed to protecting the health information that we collect from you. We have developed our privacy practices based on the Health Information Act (HIA) requirements. This legislation applies to health information we collected, used, and disclosed to provide our patients with health services, before and after the HIA came into effect. While patient consent can be granted informally, in some situations we must have formal consent to collect, use, and disclose your personal information.

Principles

Principle 1 - Accountability / Management: We Are Accountable for the Health information You Give Us

Our clinic is accountable for all health information in our possession or control, including any health information that we disclose to other custodians or that we are required to share with third parties in order to provide you with health services.

We have established policies and procedures aimed at maintaining the privacy of our patients. We have appointed a Privacy Officer to oversee privacy issues for our clinic. We have educated our employees about our privacy policies and their role in protecting your privacy. Patients with questions about our privacy practices are free to contact our Clinic Privacy Officer.

Principle 2 – Notice: We Will Explain Why We Collect Individually Identifying Health Information Before We Collect It.

We have posted a notice explaining why we collect your individually identifying health information, and the legal authority that authorizes us to collect it. We will collect individually identifying health information only for the following purposes, or as otherwise permitted by law:

- Provisioning of health services.
- Verifying eligibility or obtaining and processing payments.

- Health-related educational communications (e.g. appointment reminders, providing information about treatment alternatives, or other health-related benefits and services that may be of interest to you).

Principle 3 – Collection: We Limit the Amount and Type of Health Information We Collect.

Our clinic will only collect health information for the purposes that we have identified or as otherwise permitted by law. In addition, we will only collect as much health information as is essential to carry out the purpose for which we are collecting it.

Your health information will be collected directly from you, except in the limited circumstances where we are authorized by the HIA to indirectly collect such information.

Principle 4 - Use and Disclosure: We Will Use and Disclose Your Health Information Only for the Reasons for Which It Was Provided to Us, Unless Otherwise Permitted by Law.

In providing health services to you, we may use your health information within the clinic or may disclose it to other custodians to provide you with health services on a need to know basis for the purpose it was collected. Any third-party disclosure of information requires your written consent, unless otherwise permitted by law.

The HIA also identifies situations in which the disclosure is mandatory versus discretionary. In all cases, we will only disclose as much information as is essential for the purpose it is being disclosed as per HIA requirements.

In the future, some of your health information will be deemed “prescribed health information” and we will be required to make it accessible to authorized custodians via the Alberta Electronic Health Record (EHR) [commonly called Alberta Netcare]. Consideration of expressed wishes by the patient will be considered when making your information accessible. Be aware: patients can ask for some of their health information to be “masked” in this regard. When authorized health service providers access health information in Alberta Netcare it is considered a use of health information, not disclosure.

Principle 5 – Consent: We May Disclose Your Health Information to a Third Party with Your Written Consent to that Disclosure.

If you consent to disclosure of your health information, you may revoke that consent at any time per the requirements set out in HIA (s34). The consequences of withdrawal of consent will be discussed with you and documented.

Principle 6 – Access: You Have a Right to Access Your Health Information that is in Our Clinic’s Custody or Control Within the Provisions of the HIA.

Patients own the health information in their medical record even if the clinic owns the medical record. During the provisioning of health services, we will share your health information with you or your authorized representative(s) verbally, and allow access to or provide copies of your health information records when practical (including information in Alberta Netcare) and appropriate.

As a patient you are entitled to a copy of your medical record but our clinic also has the right to refuse to disclose health information under some circumstances [HIA s11 (1) & (2)] and to make access subject to a fee as allowed by the HIA.

Principle 7 – Safeguards: We Will Protect Your Health Information from Unauthorized Access, Use, Disclosure or Destruction.

We have assessed risks to your health information in our possession and have implemented administrative, technical and physical safeguards to eliminate or minimize risk. Examples of these safeguards include: office policies and procedures that ensure that health information cannot be seen by unauthorized persons; having employees sign oaths of confidentiality; electronic security mechanisms like firewalls and password protection; and, physically securing the clinic when we are closed.

Principle 8 – Quality: We Take Efforts to Ensure the Health Information in Our Custody or Control is Accurate and Complete Before Using or Disclosing that Health Information.

We update our registration and billing data as required. We ensure our clinic records are complete and accurate, and track additions and amendments. We make every effort to correct inaccurate or incomplete information.

Subject to limited and specific exceptions in the HIA, individuals have a right of request corrections or amendments to this information whether in the clinic EMR or Alberta Netcare.

Principle 9 - Retention and Destruction of Records: We Will Retain Your Health Information Per the College of Physicians and Surgeons of Alberta (CPSA) Guidelines, and Securely Destroy of Your Health Information When It Is No Longer Needed.

We will keep your health information per CPSA record retention guidelines or as long as necessary to accomplish the purpose for which it was collected (whichever is longer). We also follow the 10 year retention period per the HIA with regard to use and disclosure logs.

We destroy paper health information via professional shredding and destroy or use professional disk wiping software to remove health information from computer hard drives and other media.

In the event that our clinic changes in its provisioning of health care, patients will be contacted as necessary with information about the change and, when applicable, where information has been transferred. There may be options for you to exercise at that time in regard to the preservation and storage of your information.

Principle 10 – Monitoring & Enforcement: We Monitor Compliance with Our Privacy Policies and Procedures and Have a Process for Handling Complaints About the Handling of Health Information.

We regularly assess our health information safeguards, and ensure our physicians and staff know what they are and that they follow them. We have put in place protocols to deal with anyone who breaches or attempts to breach our safeguards. We investigate all privacy complaints, or suspected privacy breaches, and take appropriate remedial measures including amending our policies, disciplining staff, etc.

We have a process for handling requests for correction or amendments to health information.

In the event that a complaint regarding the usage or handling of information cannot be resolved, the Clinic Privacy Officer will advise the individual of the mechanism for referral of the complaint to the College of Physicians and Surgeons of Alberta, or the Office of the Information and Privacy Commissioner of Alberta.

Personal Employee Non-Health Related Information

Our clinic also respects the privacy rights of our employees and is committed to protecting the personal information that we collect from them.

As an employer, we will collect employee's personal information specific to payroll requirements. We will use this information in a way that is reasonable to fulfill our obligations and abide by the Personal Information Protection Act (PIPA) legislation in Alberta. The type of information we collect may include employee resume, letter of employment / contract, salary or wage history, performance related documents (including performance reviews, commendations, and disciplinary action), and tax forms. We will maintain this information securely. Employees have the right to review their own employee records by contacting the clinic Privacy Officer.

These clinic privacy principles were developed based on the "Generally Accepted Privacy Principles" as developed by the AICPA and the Canadian Institute of Chartered Accountants (CICA). Using GAPP, organizations can design and implement sound privacy practices and policies. The GAPP principles were developed using international privacy regulatory requirements and best practices.