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**PRIVACY POLICY**

Information provided by a client and their family is necessary to provide adequate assessment and treatment services at Kids Clinic and Integrate Health Services. Privacy of personal information is an important standard of our clinic. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. In the interest of transparency, this document outlines our privacy policy.

**What is Personal Health Information?**

Personal information is information about an identifiable individual. Personal information includes information that relates to: an individual’s *personal characteristics* (e.g., gender, age, income, home address or phone number, ethnic background, family status); *health* (e.g., health history, health conditions, health services received by them); or, *activities and views* (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is different from business information (e.g., an individual’s business address and telephone number). This is not protected by privacy legislation.

**Who We Are**

Our organization, Kids Clinic and Integrate Health Services, includes at the time of writing the following professionals: Developmental Paediatrician, Psychologist, Social Worker, Art Therapist, Psychotherapists, Naturopathic Doctor, Behaviour Therapists, Teachers and Support Staff. We use a number of consultants and agencies that may, in the course of their duties, have limited access to personal health information we hold. We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

**Why We Collect Personal Health Information**

**Primary Purposes**

We collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal health information is to provide comprehensive assessment and therapeutic services. A second primary purpose is to obtain a baseline of health and social information so that in providing ongoing health services we can identify changes that are occurring over time. It would be rare for us to collect such information without the client’s express consent, but this might occur in an emergency (e.g., the client is unconscious) or where we believe the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from our client and we have no reason to believe that the message is not genuine).

**Secondary Purposes**

We also collect, use and disclose personal health information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

* To invoice for services or goods provided that were not paid for at the time, to process credit card payments or to collect unpaid accounts.
* To advise clients and others of special events or opportunities (e.g., new programs/groups, workshops, development of a new service, arrival of a new product) that we have available. We will always obtain expressed consent from the client prior to collecting or handling personal health information for this purpose.
* Our clinic reviews client and other files for the purpose of ensuring that we provide high quality services. In addition, external consultants (e.g., auditors, lawyers, practice consultants, voluntary accreditation programs) may on our behalf do audits and continuing quality improvement reviews of our clinic, including reviewing client files and interviewing our staff.
* Our professionals are regulated by The Ontario College of Psychologists, The Ontario College of Social Workers and Social Service Workers and The Ontario College of Psychotherapists, which may inspect our records and interview our staff as a part of their regulatory activities in the public interest. In addition, as professionals, we will report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own. Also, our organization believes that it should report information suggesting serious illegal behaviour to the authorities. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients, or other individuals, to support the concern (e.g., improper services). Also, like all organizations, various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. In these circumstances, we may consult with professionals (e.g., lawyers, accountants) who will investigate the matter and report back to us.
* The cost of some goods/services provided by the organization to clients is paid for by third parties (e.g. private insurance,). These third-party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.
* Clients or other individuals we deal with may have questions about our goods or services after they have been received. We also provide ongoing services for many of our clients over a period of months or years for which our previous records are helpful.

**Protecting Personal Information**

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

* Paper information is either under supervision or secured in a locked or restricted area.
* Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on all computers.
* Personal health information is only stored on mobile devices if necessary. All personal health information stored on mobile devices is protected by strong encryption.
* We try to avoid physically removing personal health information from the clinic. When this is necessary, we transport, use and store the personal health information securely.
* Paper information is transferred through sealed, addressed envelopes or boxes by reputable companies with strong privacy policies.
* Our staff members are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
* External consultants and agencies with access to personal information must enter into privacy agreements with us.

**Retention and Destruction of Personal Information**

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies. However, in order to protect your privacy, we do not want to keep personal information for an excessive period of time. We keep our client files for at least ten years from the date of the last client interaction or from the date the client turns 18.

We destroy paper files containing personal health information by cross-cut shredding. We destroy electronic information by deleting it in a manner that it cannot be restored. When hardware is discarded, we ensure that the hardware is physically destroyed or the data is erased or overwritten in a manner that the information cannot be recovered.

**You Can Look at Your Records**

With only a few exceptions, clients have the right to see what personal information we hold about them. We can help clients identify what records we might have and will also try to help them understand any information (e.g., short forms, technical language, etc.). Parents or other legal guardians have a right of access to their minor child’s records. However, this is not an absolute right and any such request should be managed on a ‘need to know’ basis and on a judgment as to what is in the best interest of the child considering the nature of the information, the age of the minor, any custodial access stipulations, and his/her capacity to give informed consent.

To access records, clients must put their request in writing and confirm their identity. We will respond to requests as soon as possible (generally within 30 days). If we cannot give a client access, we will inform them of the reason. We reserve the right to charge a fee for such requests (this fee will be disclosed at the time of request and will be dependent upon the number of documents requested.

If a client believes there is a mistake in the information on their client record, they have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have formed. Where we agree that we made a mistake, we will make the correction. At a client’s request and where it is reasonably possible, we will notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from the client.

**Do You Have Questions or Concerns?**

Our Information Officer, Kylie Newstadt, will attempt to answer any questions or concerns you might have. She can be reached at: [support@integrate-health.ca](mailto:support@integrate-health.ca) or 905-683-7228 ext. 4009

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, and ensure that it is investigated promptly and that you are provided with a formal decision in writing. If we cannot satisfy your concerns, you also have the right to make a formal complaint with the Information and Privacy Commissioner of Ontario.

Information and Privacy Commissioner/Ontario  
2 Bloor Street East, Suite 1400  
Toronto, Ontario M4W 1A8  
Telephone: Toronto Area (416/local 905): (416) 326-3333 Long Distance: 1 (800) 387-0073 (within Ontario) TDD/TTY: (416) 325-7539

FAX: (416) 325-9195 [www.ipc.on.ca](http://www.ipc.on.ca)

If you have a concern about the professionalism or competence of our services or the mental or physical capacity 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 make a formal complaint to our regulatory bodies.

This policy is made under the *Personal Health Information Protection Act, 2004*, S.O. 2004, c. 3. It is a complex statute and provides some additional exceptions to the privacy principles that are too detailed to set out here.