

# Faculty Wellness Program, University of Ottawa

## Personal Health Information Privacy Policy

<p><b>Collection of Personal Health Information</b></p> <p>We collect personal health information about you directly from you. The personal health information that we collect may include, your name, date of birth, address, health history, records of your visits to FWP. Occasionally, we collect personal health information about you from other sources if we have obtained your consent to do so or if the law permits.</p>	
<p><b>Uses and Disclosures of Personal Health Information</b></p> <p>We use and disclose your personal health information to:</p> <ul style="list-style-type: none"> <li>• Provide services for you,</li> <li>• Plan, administer and manage our internal operations,</li> <li>• Conduct quality improvement activities (such as sending satisfaction surveys),</li> <li>• Compile statistics,</li> <li>• Comply with legal and regulatory requirements, and</li> <li>• Fulfill other purposes permitted or required by law.</li> </ul>	
<p><b>Your Choices</b></p> <p>You may access and correct your personal health records, or withdraw your consent for some of the above uses and disclosures by contacting us (subject to legal exceptions).</p>	<p><b>How to Contact Us</b></p> <p>Our privacy contact person is:</p> <p>The Vice-President, Governance          Tabaret Hall          550 Cumberland, Room 208          Ottawa, ON K1N 6N5</p>
<p><b>Important Information</b></p> <ul style="list-style-type: none"> <li>• We take steps to protect your personal health information from theft, loss and unauthorized access, copying, modification, use, disclosure and disposal.</li> <li>• We conduct audits and complete investigations to monitor and manage our privacy compliance.</li> <li>• We take steps to ensure that everyone who performs services for us protect your privacy and only use your personal health information for the purposes you have consented to.</li> </ul>	<p>For more information about our privacy protection practices, or to raise a concern you have with our practices, contact us at:</p> <p>Faculty Wellness Program          451 Smyth Road, Room 2132          Ottawa, ON K1H 8M5  <a href="mailto:wellness@uottawa.ca">wellness@uottawa.ca</a>          Tel: (613) 562-5800 ext. 8507</p> <p>You may complain to the Information and Privacy Commissioner/Ontario if you think we have violated your rights. The commissioner can be reached at:</p> <p><b>Information and Privacy          Commissioner/Ontario</b>  <b>2 Bloor Street East, Suite 1400</b>  <b>Toronto, ON M4W 1A8</b></p> <p><b>Toronto Area (416/local 905):</b>          (416) 326-3333</p> <p><b>Long Distance: 1-800-387-0073</b></p>

## PRIVACY STATEMENT

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Protecting your privacy and the confidentiality of your personal information has always been an important focus of the operations of the Faculty Wellness Program. The appropriate collection, use and disclosure of your personal health information are fundamental to our day-to-day operations. Each employee for the FWP must abide by our commitment to privacy in the handling of personal information.

### Applicability of This Privacy Policy

Our Privacy Policy informs you of our commitment to privacy and tells you the ways we ensure that your privacy is protected. Our Privacy Policy applies to protect the personal health information of all our clients that is in our possession and control.

### What is Personal Health Information?

Personal health information means identifying information about an individual relating to their physical or mental health, and the provision of health care to the individual. The personal health information that we collect may include, your name, date of birth, address, health history, records of your referral to and/or visits with identified treating clinicians. Occasionally, we collect personal health information about you from other sources if we have obtained your expressed consent to do so or if the law permits. When this information is collected from you by the FWP it is because we are providing services to you as a client.

When the FWP receives personal health information from the individual/client for the purpose of either determining the appropriate service to provide or in the provision of a FWP service, it is assumed that the individual/client has provided implied consent to collect, use and disclose the information for the purpose of providing health care, unless the individual/client has expressly withheld or withdrawn the consent. The FWP will discuss the issue of consent with the client. Further, for the purpose of providing a service, which may include a referral to outside resource, the FWP will provide personal health information to the outside resource with the expressed consent of the client seeking assistance from the program.

The FWP will not record or retain information received from a 3<sup>rd</sup> party that contains identifying information about an individual and meets the definition of personal health information. The FWP will record information about the 3<sup>rd</sup> party but no identifying personal health information about the subject matter of the call or contact with the program.

## **Faculty Wellness Program Privacy Policy**

Our Privacy Policy reflects our compliance with fair information practices, applicable laws and standards of practice.

### **1. Accountability**

We take our commitment to securing your privacy very seriously. Each physician and employee associated with the FWP is responsible for the personal information under his/her control. Our employees are informed about the importance of privacy and receive information periodically to update them about our Privacy Policy and related issues. In addition to establishing this Privacy Policy, we have appointed, Ms Debbie Cowan, privacy officer, for privacy matters.

### **2. Identifying Purposes: Why We Collect Information**

We ask you for information to establish a relationship and serve your needs. We obtain most of our information about you directly from you, or from other health practitioners whom you have seen and authorized to disclose to us. You are entitled to know how we use your information and this is described in this FWP Privacy policy. We will limit the information we collect to what we need for those purposes, and we will use it only for those purposes. We will obtain your consent if we wish to use your information for any other purpose.

### **3. Consent**

You have the right to determine how your personal health information is used and disclosed. For most health care purposes, your consent is implied as a result of your consent to treatment; however, in some circumstances your express, sometimes written, consent may be required.

### **4. Limiting Collection**

We collect information by fair and lawful means and collect only that information which may be necessary for purposes related to the provision of our services to you.

### **5. Limiting Use, Disclosure and Retention**

The information we request from you is used for the purposes defined. We will seek your consent before using the information for purposes beyond the scope of the posted Privacy Statement.

In general, we do not provide your personal information to third parties. We may seek your consent to forward your information to a third party (e.g. sending a referral request to an external health care provider) and have a consent form to ensure we have your permission to do so.

We retain your information within the offices of the FWP in a secure stand-alone database or in locked filing cabinets. The FWP currently does not shred, purge or store

any information offsite. The physical FWP files are maintained in keeping with the regulation under RHPA (Regulated Health Professions Act) for the content and retention of records.

## **6. Accuracy**

We endeavour to ensure that all decisions involving your personal information are based upon accurate and timely information. While we will do our best to base our decisions on accurate information, we rely on you to disclose all material information and to inform us of any relevant changes.

## **7. Safeguards: Protecting Your Information**

We protect your information with appropriate safeguards and security measures. The FWP maintains personal information in a combination of paper and electronic files. Access to personal information will be authorized only for the physicians and employees associated with the FWP, and other agents who require access in the performance of their duties, and to those otherwise authorized by law.

We provide information to health care providers acting on your behalf, on the understanding that they are also bound by law and ethics to safeguard your privacy. Other organizations and agents must agree to abide by our Privacy Policy and may be asked to sign contracts to that effect. We will give them only the information necessary to perform the services for which they are engaged, and will require that they not store, use or disclose the information for purposes other than to carry out those services.

Our computer systems are password-secured and constructed in such a way that only authorized individuals can access secure systems and databases.

If you send us an e-mail message that includes personal information, such as your name included in the "address", we will use that information to respond to your inquiry. Please remember that e-mail is not necessarily secure against interception. If your communication is very sensitive, you should not send it electronically unless the e-mail is encrypted or your browser indicates that the access is secure.

## **8. Openness: Keeping You Informed**

The Program has prepared this plain-language Privacy Policy to keep you informed. You may ask to receive a copy of it from our assistant at 613-562-5800 ext. 8507 or by e-mail at [wellness@uottawa.ca](mailto:wellness@uottawa.ca).

If you have any additional questions or concerns about privacy, we invite you to contact:

**Freedom of Information Co-ordinator**  
**c/o Office of the Vice-President, Governance**  
**Tabaret Hall**  
**550 Cumberland, Room 208**  
**Ottawa, ON K1N 6N5**  
[fippa@uOttawa.ca](mailto:fippa@uOttawa.ca)

## **9. Access and Correction**

With limited exceptions, we will give you access to the information we retain about you within a reasonable time, upon presentation of a written request and satisfactory identification.

We may charge you a fee for this service and if so, we will give you a notice in advance of processing your request.

If you find errors of fact in your personal health information, please notify us as soon as possible and we will make the appropriate corrections. We are not required to correct information relating to clinical observations or opinions made in good faith. You have a right to append a short statement of disagreement to your record if we refuse to make a requested change.

If we deny your request for access to your personal information, we will advise you in writing of the reason for the refusal and you may then challenge our decision.

## **10. Questions or Concerns**

We encourage you to contact us with any questions or concerns you might have about your privacy or our Personal Health Information Privacy Policy. We will investigate and respond to your concerns about any aspect of our handling of your information.

In most cases, an issue is resolved simply by telling us about it and discussing it. You can reach us at:

Faculty Wellness Program  
UOttawa  
451 Smyth Road, Room 2132  
Ottawa Ontario  
K1H 8M5

Voice: 613-562-5800 ext. 8507  
Fax: 613-562-5457

If, after contacting us, you feel that your concerns have not been addressed to your satisfaction, we will provide information on other complaint procedures that may be available to you.

### **Conclusion**

Any changes to our Personal Health Information Privacy Policy shall be acknowledged in this Privacy Policy in a timely manner. You may see when this Code was last updated by referring to the modification date found below.

Last modified: December 2008

*Approved by the Administrative Committee on April 30, 2008*