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PRIVACY STATEMENT

I am committed to respecting and protecting your privacy. I am committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for our services. I am also open and transparent as to how I handle personal information. This statement outlines my policies and procedures with respect to collecting, using, and disclosing your personal health information. It also provides information about how you can access records of your personal health information.

Definition of “Personal Health Information”

The practice of naturopathic medicine in Ontario is regulated under the Drugless Practitioners Act. As such, all identifiable information collected by a naturopathic doctor about an individual, in the course of practicing naturopathic medicine, is considered “personal health information” under the Personal Health Information Protection Act, 2004 (PHIPA). This includes your name and contact information, as well as any information collected/recorded in the course of providing services to you. Personal information is to be contrasted with business information, business address or phone number, which is not protected by privacy legislation.

Collection of Your personal Health Information

I collect your personal health information only directly from you, except: a) when you have provided consent to obtain such information from others (e.g. reports of previous assessments or of other services); and b) where the law requires or allows me to collect information without your consent (e.g., in an urgent situation, when information is needed to prevent potential harm).

I collect only information from you that I believe is needed: a) to provide you with the services you have requested and/or for which you have been referred; b) to maintain contact with you for service-related or future consent purposes; c) to prevent or offset harm (e.g. asking for an emergency contact). If I collect information from you for any other purpose (e.g., research), it will be done only with your informed consent. If you decide that you do not want to provide this latter type of information you are completely free to refuse. There will be no impact on your services.

By law and in accordance with professional standards, I am required to keep a record of services provided to and contacts with you. Your record includes information you provide or authorize me to receive, results of any assessments, your service plan, consent forms, contact notes, progress summaries, billing information, and correspondence that I

have sent or received related to your service. They physical records are the property of my practice. However, you have rights regarding access to your record and regarding disclosure of information from your record (see below), regardless of the form in which the information is recorded.

Use of Your personal Health Information

In my office, the primary use of your personal health information is to provide health services to you. We collect information about your health history, physical condition and function and your social situation in order to help us assess what your needs are, advise you of your options and to provide naturopathic treatment. 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. This includes carrying out all of the functions reasonably necessary to provide those services (e.g., service planning and monitoring, maintaining your record, billing, etc).

Like most organizations, we also collect, use and disclose 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 patients for goods and services or to collect accounts.
- To advise patients it is time for a check-up or re-assesses products.
- Our clinic reviews patient and other files for the purpose of ensuring high quality service. This includes assessing the performance of our staff. In addition, external consultants (e.g. auditors, lawyers, practice consultant, bookkeeper) may on our behalf do audits or conduct quality improvement reviews of our clinic.
- We do include your email address on an email forum so you can receive timely information about clinic events.

I may involve other individuals who may, in the course of their duties, have limited access to your personal information. These include interns, computer consultants, bookkeepers and accountants, and credit card companies/banks. All staff that comes in contact with your personal information is trained in the need for privacy and confidentiality as well as in my practice's privacy policies and procedures, including prevention of record loss and unauthorized access. Staff members are allowed to access only that information they have a "need-to-know". This means that staff members involved in billing, for example, is allowed to access only the information needed to carry out their billing function. They are not allowed to access other information. Personnel who know a client personally are required to declare this and to remove themselves from access to that client's record unless there is an emergency or unless the client has given express consent for access.

Paper information and electronic hardware are either under supervision or secured in restricted areas at all times. In addition, passwords are used or computers are in secure places. Paper information is transmitted through sealed, addressed envelopes or boxes by

reputable companies. Electronic information is transmitted either through a direct line or is encrypted.

About Members of the General Public

For members of the general public, our primary purposes for collecting personal information are to provide notice of special events (e.g. a seminar or conference) or to make them aware of naturopathic services in general or our clinic in particular. For example, we may collect home addresses, fax numbers and email addresses. We will, upon request, immediately remove any personal information from our distribution list.

On our website, we only collect, with the exception of cookies, the personal information you provide and only use that information for the purposes you gave it to us (e.g. to respond to your email message, to register for a course or to subscribe to our newsletter). Cookies are only used to help you navigate our website and are not used to monitor you.

Disclosure of Your Personal Health Information

With only a few exceptions, your personal health information will not be disclosed to persons outside this office without your knowledge and express consent. The exceptions are circumstances in which disclosure is allowed by law:

- (a) When there is a clear and imminent risk of serious bodily harm to someone, including the possibility of self-harm.
- (b) When disclosure is needed to receive professional or legal consultation
- (c) For mandatory reporting of a child who might be in need of protection.
- (d) For mandatory reporting of a regulated health professional who has sexually abused a client.
- (e) In compliance with a court order to release information from a record.
- (f) To comply with the professional regulations established by the Board of Directors of Drugless Therapy – Naturopathy (BDDT-N), who may inspect records and interview staff as a part of their regulatory activities (e.g., quality assurance) in the public interest.
- (g) To comply with the regulatory authorities under the terms of the Drugless Practitioners Act (DPA) for the purposes of the Board of Directors of Drugless therapy – Naturopathy for fulfilling their respective mandates under the DPA, as well as for a defense of a legal issue.
- (h) To insurance companies, employee assistance programs, credit card companies or other third-party payers as needed, who often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate your entitlement to this funding and to answer questions about our services you have received.

All persons involved in these activities are required by law to maintain the confidentiality of any accessed information. The above exceptions are called “limits of confidentiality”

If there are other limits of confidentiality in your situation, I will identify and discuss them with you before proceeding with your service.

Please note that the law requires any disclosure of your personal health information to be limited to information that is reasonably necessary for the purpose of the disclosure, and not to include private information provided by a third party, unless you are involved in an open mediation or custody/access assessment. Professional ethical standards additionally require that any information that might cause serious harm to someone not be disclosed, unless the law requires disclosure.

When consenting to the disclosure of your personal health information to another health professional, who is providing services to you, you may restrict me from sharing all or any part of your personal information. However, if in my opinion the information is reasonably necessary for another health service provider to provide appropriate service, I am required by law to inform the other provider that you have refused consent to provide some needed information.

Retention and Destruction of Personal Information

We retain personal information to ensure that we can answer any questions you may have about services provided and for our own accountability to external regulatory bodies. I am required by legislation and my regulatory body to retain personal information for approximately no less than 10 years. Our patient and contact directories are difficult to destroy, so we remove such information when it does not appear that we will be contacting you again. However, on request we will remove such contact information timely. We keep any personal information relating to our general correspondence (ie. With people who are not clients) newsletters and seminars for about six months. We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed.

Your Right of Access to your Personal Health Information Record

With only a few exceptions, you have the right to access any record of your personal health information, and to request copies of the information. If the physical record contains personal health information about another individual, that individual's information must be able to be severed from the record before you may access the record. Because of the nature of certain services, severing information in some, not all places of the record can be difficult and at times impossible.

Other exceptions include access to copyrighted test information (test items, protocols, manuals), information provided in confidence by a third party, and information that could result in serious harm to someone's treatment or recovery, or in serious bodily harm to someone.

If you are the custodial parent or guardian of a child receiving service, you may not access (without the child's consent) the personal health information of a child, who was deemed competent and who consented to the service on his/her own. In addition, there are restrictions on custodial parents/guardians access to individual notes regarding their children.

If you request your personal file:

- I may need to confirm your identify, if you have not received service for some time, before providing you with this access.
- I reserve the right to charge a nominal fee for such requests, including the cost of retrieving your file from storage and separating out your information from those of other affected parties.
- If I cannot give you access, I will tell you within 14 days and explain why not.
- If you believe there is a mistake in the information, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions I may have formed. I may ask you to provide documentation that our files are wrong.
- Where we agree there is an error, I will make the correction and notify anyone to whom I have sent the incorrect information. If we do not agree that I have made an error, you may provide a notice of disagreement that will be included in the file and I will forward that notice to anyone else who received the earlier information

Concerns and Further Information

If you would like more detailed information at any time, would like to access or ask for a correction of your record, have a concern about my privacy policies and procedures, or have a concern about the way your privacy has been handled, please do not hesitate to speak to or write to me.

This privacy policy has been developed in accordance with the Personal Health Information Protection Act, 2004 (PHIPA) and professional regulations and ethical standards. PHIPA is a complex Act and provides some additional exceptions to the information protection and privacy principles that are too detailed to set out here

Further details of the applicable laws, regulations and standards may be found at the Websites of the Ontario Ministry of Health and Long Term Care (www.health.gov.on.ca), the Board of Directors of Drugless Therapy-Naturopathy (www.boardofnaturopathicmedicine.on.ca), the Ontario Association of Naturopathic Doctors (www.oand.org), and the Personal Health Information Protection Act (www.ipc.on.ca).

For more general inquiries, the information and Privacy Commissioner of Ontario oversees the administration of the privacy legislation in the private sector. The commissioner can be reached at:

80 Bloor Street West, Suite 1700

Toronto, Ontario M5S 2V1

Phone (416) 326-2222

Web: www.ipc.on.ca E-mail: commissioner@ipc.on.ca