

## Privacy Policy & Contact Information

CommuniCare Therapy recognizes the importance of maintaining our client's privacy. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services that we provide. This document gives a brief description of our privacy policies and whom you may contact if you have any questions.

### Personal Information:

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

### About CommuniCare Therapy

CommuniCare Therapy provides some or all of the following services: Occupational Therapy, Physiotherapy, Speech Language Pathology, Social Work and Dietetics.

We use a number of employees and consultants that may, in the course of their duties, have limited access to personal information we hold. These include administrative and management staff, computer consultants, software as a service providers, office security and maintenance, cleaners and lawyers. We restrict their access to any personal information we hold as much as is reasonably possible. We also have signed confidentiality agreements that ensure that appropriate privacy principles are followed and demonstrate individual acknowledgements of their responsibilities for protection of personal information.

### CommuniCare Collects Personal Information: About Clients

As health care providers, we collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal information is to provide treatment. For example, we collect information about a client's health history, including their family history, physical condition and function and social situation in order to help us assess what their health needs are, to advise them of their options and then to provide the health care they choose to have. 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).

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 private clients for goods or services that were not paid for at the time.
- To advise clients that their product or service should be reviewed (e.g., to ensure a product is still functioning properly and appropriate for their then current needs and to consider modifications or replacement).
- Our office reviews client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff. 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 CommuniCare, including reviewing client files and interviewing our staff.
- We may use our client's names and addresses as part of our continuous quality improvement initiatives. This may include sending out client satisfaction surveys by mail or by telephone.

- Our clinicians are regulated by their professional colleges who 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., OHIP, WSIB, private insurance, Assistive Devices Program). 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. We retain our client information for a minimum of ten years after the last contact to enable us to respond to those questions and provide these services (our regulatory Colleges also require us to retain our client records).
- If CommuniCare Therapy or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of our records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization’s business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

You can choose not to be part of some of these related or secondary purposes (e.g., by declining to participate in surveys or by paying for your services in advance if you are a private client). We do not, however, have control over several of these related or secondary purposes (e.g., external regulation).

### **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, personal secure passwords are used on computers.
- All data is stored on secure servers that are backed up at regular intervals.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Any computer files containing client information are encrypted for external transmission.
- No identifiable client information is sent through external (non-secured) email. All faxes are sent securely. Fax and email transmissions are prefaced with a confidentiality statement.
- Staff is 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, we do not want to keep personal information too long in order to protect your privacy. We keep our client files for about ten years. Our client and contact

directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again. However, if you ask, we will remove such contact information right away.

### **You Can Look at Your Information**

With only a few exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge a nominal fee for such requests. If there is a problem we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access. 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 we may have formed. We may ask you to provide documentation that our files are wrong. Where we agree that we made a mistake, we will make the correction and 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 you on the point and we will forward that statement to anyone else who received the earlier information.

### **Do You Have a Question?**

Please contact our **Privacy officer at: 2723 Lancaster Rd., Suite 202 Ottawa, Ontario K1B 0B1 Phone: (613) 738-2871 or toll free 1-877-738-2871.** We will attempt to answer any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Privacy Officer. They will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

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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 complain to our regulatory body:

#### **For Occupational Therapy Services:**

College of Occupational Therapists of Ontario 20 Bay Street, Suite 900, Toronto, ON  
M5J 2N8 Phone: 416-214-1177 Toll Free: 1(800) 890-6570 Website: <http://www.coto.org>

#### **For Physiotherapy Services:**

College of Physiotherapists of Ontario 230 Richmond Street West, 10th Floor Toronto, ON M5V 1V6 Phone: 416-591-3827 Toll free: 1(800)583-5885 Website: [www.collegept.org](http://www.collegept.org)

#### **For Speech Language Pathology Services:**

College of Audiologists and Speech-Language Pathologists of Ontario 3080 Yonge Street Suite 5060  
Toronto, Ontario M4N 3N1 Phone: 416-975-5347 Toll Free: 1-800-993-9459 Website: <http://www.caslpo.com>

#### **For Social Work Services:**

College of Social Workers and Social Service Workers of Ontario 250 Bloor Street E, Suite 1000 Toronto, Ontario M4W 1E6  
Phone: 416-972-9882 Toll Free: 1-877-828-9380 Website: <http://www.ocswssw.org>

#### **For Dietetics Services:**

College of Dietitians of Ontario 5775 Yonge Street Toronto, ON M2M 4J1 Phone (416)598-1725 Toll Free: 1-800-668-4990  
Website: [www.cdo.on.ca](http://www.cdo.on.ca)

#### **For Office Administration and Management services:**

Please contact CommuniCare's Executive Director: Kim Collingwood at [kcollingwood@communicare.ca](mailto:kcollingwood@communicare.ca)

or at 613-738-2871 x228.

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This policy is guided by the Personal Health Information Protection Act (2004), a complex Act that allows for some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above.

For more general inquiries, the Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes.

The Privacy Commissioner of Canada can be reached at [www.privcom.gc.ca](http://www.privcom.gc.ca) and the Information and Privacy Commissioner of Ontario can be reached at [www.ipc.on.ca](http://www.ipc.on.ca) .