

DR. MELANIE COCHRANE & ASSOCIATES PRIVACY POLICY

Dr. Melanie Cochrane & Associates (MCA) seeks to maintain the strictest standards of confidentiality and privacy with respect to your personal health information. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. We aim to be open and transparent as to how we handle personal health information. This document describes our privacy policies.

MCA and its staff are bound by law and ethics to safeguard your privacy and the confidentiality of your personal health information. This information is regulated provincially under the Personal Health Information Act, 2004 (PHIPA) and federally under the Personal Information Protection and Electronic Documents Act, 2004 (PIPEDA). Moreover, confidentiality is an integral part of the code of ethics for regulated health professionals.

What is personal information?

Throughout the course of your services (assessment and/or treatment) with MCA personal health information is collected about you. Personal health information includes identifying information about an individual, such as their address of residence, birthdate, phone number, or email address. It can also include identifying details specific to an individual's health such as physical or mental health problems and information about health services received, as well as identifying details specific to an individual's activities (work, recreation, relationships) and their views and opinions. Personal health information may also include records of your visits to MCA and the care services that you received during those visits.

Some Reasons for Collecting Personal Health Information:

- Providing information about the services offered at MCA to individuals referred to us or who contact us via phone or email.
- Facilitating diagnosis and treatment of psychological, physical, and/or neurological challenges by gathering relevant information such as age, education, work history, social relationships, medical and family history, and details of the challenges impacting your life.
- Processing payments for services rendered.
- Communicating with third-party payers whom you have consented for us to disclose your personal information.

Disclosure of Personal Health Information:

With only a few exceptions, your personal health information will not be disclosed to people outside this office without your knowledge and express consent. These exceptions are known as the "limits of confidentiality". This includes some limited circumstances where regulated healthcare professionals at MCA are required by law or by professional ethics to disclose your personal health information and where such disclosure can occur without your consent. These circumstances are primarily ones where either your, or another person's health and safety is

believed to be at imminent risk. Depending on the nature of the circumstances this could include legal obligation to disclose information, for example to the Children's Aid Society, Retirement Home Regulatory Authority, Ministry of Health and Long-Term Care, or the healthcare professional's regulatory College. It also includes legal obligation to release information by court order, such as a subpoena, for the clinical health record or for testimony.

Personal Health information may be seen in the process of a formal audit by the government or by the healthcare professional's regulatory College. These audits are strictly confidential, and a record of the audit will be inserted into any file reviewed by the auditors.

MCA uses a number of consultants and agencies that may, in the course of their duties, have limited access to some of the personal information we hold. These include bookkeepers and accountants, credit card companies, website managers and lawyers. 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.

Protecting Your Personal Information:

- We ask your permission before we collect, use, or show your information to anyone for any purpose other than our main activities, such as providing care.
- Client personal health information is entered into an electronic medical record (EMR). MCA has taken reasonable steps to ensure these records are secure and protected from theft, loss and unauthorized use or disclosure, including copying, modification, or disposal.
- We make sure that your information stays private. Only the people who need to see your personal records can look at them. Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- We take steps to ensure your information is not lost or stolen. We further ensure that your information is not copied, changed, shared, discarded or used unless permitted.
- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic information is hosted on a secure server in Canada and is protected from unauthorized access, loss, theft, or disclosure.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers and telephone voicemail boxes.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line or has identifiers removed or is encrypted.

Electronic Medical Record (EMR) Safeguards:

Only authorized staff use the EMR. No unauthorized person can access identifiable health information.

Each authorized user is assigned a unique identity in the EMR.

The information each authorized user can access is based on their role (e.g., an administrative staff may have access only to client identification and appointment information).

The EMR is protected by password controls and data encryption.

Identifiable health information is always transmitted securely.

Data is regularly backed up and the backed-up data is stored securely.

Before any hardware containing EMR data is disposed of, all identifiable health information is removed and can never be reconstructed.

Retention and Destruction of Personal Information:

MCA needs to retain personal information of individuals inquiring about our services for a short period of time to ensure that we can adequately answer any questions you might have and for our own accountability to external regulatory bodies. However, we do not keep your personal information for more than a few months in order to protect your privacy.

We retain our client files for a minimum of ten years after the last clinical contact. If the client was less than eighteen years of age at the time of their last relevant clinical contact, we retain our client information for a minimum of ten years following the day the client became or would have become eighteen. This practice is in accordance with regulatory guidelines and legislation. All paper documents containing personal information are destroyed 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. 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., abbreviation, technical language, etc.). We will need to confirm your identity, if we do not know you or if you have not received service for some time 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 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 therapy notes regarding their children.

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 but 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.

Questions or concerns about your privacy?

Please do not hesitate to contact us if you would like more detailed information about MCA's privacy policies and procedures. Our currently designated Privacy Officer, Dr. Melanie Cochrane, can be reached at our office:

Main: (226)-400-2155 | Email: info@mcapsych.ca

Concerns and Further Information:

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, ensure that it is investigated promptly and that you are provided with a formal written decision with reasons.

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:

College of Psychologists of Ontario
110 Eglinton Avenue West, Suite 500
Toronto, Ontario M4R 1A3
Phone (416) 961-8817 | 800-489-8388 | Fax (416) 961-2635
www.cpo.on.ca

You have the right to complain to the Information and Privacy Commissioner/Ontario if you think we have violated your rights

Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto, Ontario M4W 1A8
Phone (416) 326-3333 | 800-387-0073 | Fax (416) 325-9195 | TTY (416) 325-7539
www.ipc.on.ca

Additional Resources:

Further details of the applicable laws, regulations, and standards informing our privacy policies and procedures may be found by visiting:

Ontario Ministry of Health and Long Term Care

College of Psychologists of Ontario

The Canadian Psychological Association

The Personal Health Information Protection Act