



Client Lockbox Information: How to Restrict Access to your Health Record

You have a right to make choices and control how your health information held by ICHA is collected, used, and disclosed, subject to a few exceptions.

You have the right to ask that we not share some or all of your health record with one or more of the staff members involved in your care, or ask us not to share your health record with your external health care providers (such as a specialist). This is known as asking for a “lockbox”.

What is in your health record?

Your health record includes information such as your health history, your medications and results from lab tests and notes from your health care providers within ICHA or from your other health care providers that has been sent to us.

Who sees your health record?

Our privacy policy protects all of your health information. Only staff members who provide health care and services to you are authorized to look at your health information, and only when they need to see that information to do their job. Otherwise we require your consent.

We use your health information to make sure we can give you the best care. Your health information is shared only within your “circle of care”— meaning, for example the physicians, nurses, social workers, hospitals, Community Care Access Centre staff and other people and organizations that help with your health care. ICHA will not share your health information with anyone not involved in your health care — for example, your family or friends, shelter staff or agency staff not involved in your health care — unless we get your permission to do so or unless permitted or required by law (see “Lockbox Exceptions” below).

What is a “lockbox”?

It’s not exactly a “box” – and it doesn’t have a lock. And a lockbox can mean different solutions depending on your request. Generally speaking, a lockbox means that all or part of your health information will be blocked from anyone’s view. While all our health records are kept in a way to maximize patient confidentiality, a lockbox will restrict the access to your health information from your care givers and other institutions.

Are there risks to having a lockbox?

There are some risks to putting your health information in a lockbox that you should consider before making your decision:

- Your health care providers may not have the information they need to give you the best possible care in a timely manner.
- Your health care providers may not have enough information to safely provide you with services and so may not be able to offer you care.
- It may be harder for your health care providers to share your information in an emergency.
- There may be errors in assessments, treatment or medications if the people providing care do not have enough information or do not have the right information about you.
- You may have to undergo duplicate tests, procedures and health history questions if existing information is unavailable.
- There may be other risks specific to you and your request, which we will discuss with you.

Lockbox Exceptions

Under the law, there are times when ICHA is allowed to or must collect, use, or disclose personal information about you — without your consent — even if your information is otherwise “locked”.

If your personal information is already in a lockbox, the “lock” may be broken and your information may be used or disclosed as permitted or required by law. We have provided some examples, but there may be other circumstances where the use or disclosure of your personal information is permitted or required by law. We may use or disclose your health information without your permission in order to, for example:

- Make reports to the Ministry of Transportation or Public Health or other mandatory reports
- Protect you or someone else if we believe there is a significant risk of serious harm
- Obtain or process payments
- Plan our services
- Engage in quality improvement exercises
- Dispose of information
- Comply with a court order
- Defend ourselves in litigation
- Engage in research (as long as we have research ethics board approval)
- Teach our staff to provide health care

If you have questions about how we can use or disclose your health information, you can ask a team member or contact ICHA’s Privacy Officer whose contact information is noted below.

How do you request a lockbox?

You can discuss any concerns regarding the privacy and confidentiality of your health information and your lockbox options with your physician or our Privacy Officer. In some cases you may not need a lockbox in order to protect your information and we can discuss alternatives or options with you. For instance, you do not need a lockbox to prevent health care professionals at the Organization who are not involved in your care from viewing your personal information as these professionals are not within your “circle of care” and are therefore already not permitted to access your information on the basis of the Organization’s policies and the applicable privacy laws.

You can submit your lockbox request in writing using our “Patient Lockbox Request” form, which can be obtained from your physician or our Privacy Officer. The completed form should be given to your physician or our Privacy Officer.

Lockbox requests are processed on a case-by-case basis. The Organization’s Privacy Officer will review and respond to lockbox requests in consultation with your health care team. We may not be able to accommodate every request – but we will explain any limits with you. The Organization will provide you with confirmation in writing in the event that your lockbox has been implemented. You can also request that your lockbox be removed at any time by contacting Privacy Officer.

ICHA’s Privacy Officer

Can be reached by calling 416 591 4411

Information and Privacy Commissioner/Ontario:

2 Bloor Street East, Suite 1400
Toronto, Ontario M4W 1A8 Canada

Telephone

Toronto Area: 416-326-3333
Long Distance: 1-800-387-0073 (within Ontario)

Fax

416-325-9195