

## *Privacy Policy*

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### **Introduction**

Inner City Health Associates (ICHA) is a group of physicians that provide health care to people who are homeless or at risk of becoming homeless. We work in more than 40 sites in Toronto including shelters, drop-ins centres and community organizations.

### **Privacy and Confidentiality**

Inner City Health Associates values your privacy. We commit to treat your health information with respect and to protect your privacy.

### **Electronic Health Records**

ICHA doctors, staff and partner agency staff will record your health information in an electronic medical record that is password and firewall protected. In some cases, there may also be a paper health record. All the doctors working at ICHA will have access to your health records if needed, even if you see them at another ICHA site. This helps us have the information we need to provide you with good medical care.

### **Legislation**

ICHA complies with the Health Information Protection Act (November 2004), comprised of both the Personal Health Information Protection Act (2004) and the Quality of Care Information Protection Act (2004).

#### Website Links:

Personal Health Information Protection Act 2004:

<https://www.ipc.on.ca/english/phipa/>

Quality of Care Information Protection Act 2004:

<http://www.health.gov.on.ca/en/common/legislation/qcipa/>

According to this legislation, ICHA is a health information custodian (HIC) of your personal health information. This means that we have custody and control of the health information contained in your ICHA medical record.

ICHA is also a health information network provider, which means that we provide a network for electronic health records to be shared amongst a group of our partner agencies that may also have responsibilities as health information custodians.

The key privacy principles from these Acts that ICHA is responsible for include:

### **Principle 1 - Accountability for Personal Information**

ICHA is responsible for personal information under its custody or control. We have appointed a Privacy Officer, to be accountable for the organization's compliance with the legislation and the privacy principles that follow.

### **Principle 2 - Identifying Purposes for Collection of Personal Information**

As your personal information is being collected, ICHA will identify the purpose for which it is collected. The primary purposes include: delivery of direct patient care; administration of the health care system; research and statistics; or to comply with legal and regulatory requirements.

### **Principle 3 - Consent for the Collection, Use and Disclosure of Personal Information**

- **Implied consent for provision of care:** By seeking care from us, your consent is implied (i.e., assumed) for your information to be used by Inner City Health Associates to provide you with care, and to share with other providers involved in your care.
- **Disclosure to other health care providers:** Relevant health information is shared with other providers involved in your care, including (but not limited to) other physicians and specialists, pharmacists, nurses, case workers, and counselors.
- **Disclosures authorized by law:** There are limited situations where we are legally required to disclose your personal information without your consent. These situations include (but are not limited to) billing provincial health plans, reporting infectious diseases and fitness to drive, or by court order.

### **Principle 4 - Limiting Collection of Personal Information**

Only information that is needed for the purposes of providing you with health care will be collected. Information will be collected by fair and lawful means.

### **Principle 5 - Limiting Use, Disclosure and Retention of Personal Information**

Personal information will not be used or disclosed for purposes other than for those for which it was collected, except with the consent of the individual or as required by law. Personal information will be retained only as long as necessary for fulfillment of those purposes and in compliance with legislation.

### **Principle 6 - Ensuring Accuracy of Personal Information**

Personal information will be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

### **Principle 7 - Ensuring Safeguards for Personal Information**

ICHA will use appropriate safeguards to protect your personal health information. ICHA will make all physicians, staff, and agency partners aware of the requirement to maintain the security of personal health information and will require each

individual with access to your personal health information to sign a Confidentiality Statement.

**Principle 8 - Openness about Personal Information Policies and Practices**

Information regarding ICHA's policies and practices relating to the management of personal information are available upon request.

**Principle 9 - Individual Access**

You may request access to their personal health information. You may challenge the accuracy and completeness of the information and have it amended as appropriate.

**Principle 10 - Making a complaint about how ICHA handles your health information**

You may direct a complaint concerning how we have handled your privacy to your physician or to ICHA's Privacy Officer. The Privacy Officer may be contacted at: Alexandra Pinto at 416-775-3622, or [pintoa@smh.ca](mailto:pintoa@smh.ca).

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