

# *Janna Adler M.Sc., Reg. CASLPO*

SPEECH-LANGUAGE PATHOLOGIST

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## **PRIVACY POLICY STATEMENT**

As of January 1<sup>st</sup>, 2004, Federal Legislation entitled the '**Personal Information Protection and Electronic Documents Act**' (PIPEDA) went into effect. This law governs the protection of personal information of individuals. Fortunately, there are few changes in this office in this regard, however, I can assure you that I am committed to protecting your personal information. In order to provide quality service to you, I will collect, use and disclose personal information responsibly. Please read the consent form and once you've understood its contents, please sign. I will be happy to answer any questions you may have.

**Personal information** is information that relates to personal characteristics (e.g., gender, age, home address or phone number, ethnic background, family status), health (e.g., health history, health conditions, health services received) or activities and views (opinions expressed by 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 the new privacy legislation.

**Being a sole practitioner**, I stand as the Privacy Information Officer for my practice. At the time of writing, an occasional student observed sessions. To assist in providing services, I use individuals who may, in the course of their duties, have limited access to personal information, such as: computer consultants and accountants. I restrict their access to any personal information as much as is reasonably possible. I also have their assurance that they follow appropriate privacy principles.

**The primary purposes for collecting personal information** is to provide effective speech, language and hearing services. This would include such things as your child's birth, health, family and educational history, languages spoken, his/her personality and interests, prior assessments and therapy. This will be relevant to the communication disorder in assisting me in offering effective intervention. Another primary purpose is to obtain a baseline of your child's communication skills to track change over time. It is rare to collect information without prior consent, but it might happen in the case of a health emergency (e.g., an infectious disease outbreak) or to investigate a possible breach of law (e.g., if a theft were to occur in my office).

**Related or secondary reasons for collection, use and disclosure of information are as follows:**

- ☐ To secure payment for service.
- ☐ To enable me to contact you and maintain communication as needed
- ☐ To advise clients and others of special events or opportunities (e.g., a seminar, a new service, support group, or product).

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- ❑ To allow me to meet my regulatory obligations. The College of Audiologists and Speech-Language Pathologists may inspect my records as part of their regulatory activities in the public interest. Various government agencies (e.g., Canada Customs and Revenue Agency, Privacy Commissioner, Human Rights Commission, etc.) have the authority to review client records as a part of their mandates. External regulators have their own strict privacy obligations. In these circumstances, I may consult with professionals (e.g., lawyers, accountants) who will investigate the matter and report to me.
- ❑ To provide information to third party payers (e.g., private insurance, when they pay for services you receive from me). I will obtain your consent to disclose your personal information in these instances except in instances where there is legislative authority to collect, use or disclose the information.
- ❑ To answer any questions you may have about the service you received once it is concluded.
- ❑ To allow me to provide required information to prospective purchasers, practice brokers or advisors to conduct an audit in preparation for a practice sale if this practice or its assets are to be sold, in order to conduct a “due diligence” review of accounting and service files.
- ❑ Communicating with other service providers to ensure the best possible collaborative care is another important aspect for using your information.
- ❑ For teaching and demonstration purposes on an anonymous basis
- ❑ Collection, use and destruction of personal information must comply generally with the law and our regulatory body.

If you choose not to be part of some of these related or secondary purposes, please let me know so that I may take the appropriate measures where possible.

I understand the importance of **protecting personal information**. For that reason, I have taken the following steps:

- ❑ Paper information is secured in a locked or inaccessible area.
- ❑ Electronic hardware is restricted. My computer is password protected.
- ❑ Paper information is sealed and transmitted by reputable companies.
- ❑ Special care is taken to ensure privacy when transmitting electronic information. Where I am unsure of the security of the electronic transfer of information, identifying information is removed.
- ❑ External consultants and agencies that may have access to personal information must enter into privacy agreements with me.

With respect to **retention and destruction of records**, the College of Audiologists and Speech-Language Pathologists of Ontario requires that we retain our client records for 10 years past the last visit or in the case of a child, for 10 years past the child’s 18<sup>th</sup> birthday. We destroy our files within three months of that time. Contact information for members of the public is kept for 3 years unless requested to do so earlier.

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.

With only a few exceptions, **you have the right to see what personal information I hold about you**. I will need to confirm your identity, before providing you with such access. I reserve the right to charge a nominal fee for such requests. If access is denied, I will tell you within 30 days if possible and state the reason, as best as I can. If you believe there is an error in the information, you have the right to request a correction. This

applies to information and not my professional opinions. I may ask you to provide documentation that my files contain errors. Where we agree that I made a mistake, I will make the correction and notify anyone to whom we sent this information. If we are not in accordance, I will document a brief statement from you on your issue and I will forward that statement to anyone else who received the earlier information.

**If you wish to make a formal complaint about my privacy practices, you may make it in writing to me.** I 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. Alternatively, you are entitled to make a formal complaint to the Privacy Commissioner of Canada.

If you have a concern about the professionalism or competence of my services, or if I am unable to satisfy your concerns, you are entitled to complain to our regulatory body:

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College of Audiologists and Speech Language Pathologists of Ontario

Ordre des audiologistes et des orthophonistes de l'Ontario

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This policy is made under the *Personal Information Protection and Electronic Documents Act*. It is a complex Act and provides 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 Office of the Privacy Commissioner can be reached at:

112 KENT STREET | OTTAWA, ONTARIO | K1A 1H3

**PHONE** (613) 995-8210 | **TOLL-FREE** 1-800-282-1376 | **FAX** (613) 947-6850 | **TTY** (613) 992-9190 [www.privcom.gc.ca](http://www.privcom.gc.ca)

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