

Personal Information and Privacy Policy

Privacy of personal information is an important principle at Toronto-Centre Naturopathic Medicine. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. We also try to be open and transparent as to how we handle personal information. This document describes our privacy policies.

WHAT IS 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 telephone number, ethnic background, family status), their health (e.g., health history or measurements [e.g., blood test results], health conditions or diagnoses, prognosis, 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.

WHO WE ARE

Our organization, Toronto-Centre Naturopathic Medicine, includes at the time of writing two naturopathic doctors and one support staff (i.e., receptionist). We use a number of consultants that may, in the course of their duties, have limited access to personal information we hold. These include computer consultants, bookkeepers, accountants 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.

Why We Collect Personal Information: Primary Purposes

ABOUT CLIENTS

Like all naturopathic doctors, we collect, use and disclose personal information in order to serve our patients. For our patients, the primary purpose for collecting personal information is to provide naturopathic medical treatment. For example, we collect information about a patient's health history, including their family history, physical function and social situation in order to help us assess what their needs are, to advise them of their treatment options and then to provide the healthcare 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 patient's express consent, but this might occur in an emergency (e.g., the patient is unconscious) or where we believe the patient would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from our patient and we have no reason to believe that the message is not genuine).

ABOUT MEMBERS OF THE GENERAL PUBLIC

For members of the general public (e.g., seminar attendees), our primary purposes for collecting personal information are to provide notice of special events (e.g., open house or seminars) or to allow for follow-up contact in the case of health assessments. We try to obtain consent before using any such personal information, but where this is not, for any reason possible, we will upon request remove any personal information from our distribution list.

ABOUT CONTRACT STAFF, VOLUNTEERS AND STUDENTS

For people who are contracted to do work for us (e.g., receptionist), our primary purpose for collecting personal information is to ensure we can contact them in the future (e.g., to provide them with letters of reference). Examples of the type of personal information we collect for those purposes include home addresses and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen (e.g., to investigate a possible breach of law [e.g., if a theft were to occur in the Clinic]). If contract staff, volunteers or student preceptors wish a letter of reference or an evaluation, we will collect information about their work related performance and provide a report as authorized by them.

Why We Collect Personal Information: Related and Secondary Purposes

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 patients for goods and services that were not paid for at the time or to collect unpaid accounts.
- To advise patients and others of special events (e.g., open house or seminars)
- Naturopathic doctors are regulated by the Board of Drugless Therapy – Naturopathy 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 patients, 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 services provided by the organization to patients is paid for by third parties (e.g., private insurance). 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 patient entitlement to this funding.
- Patients or other individuals we deal with may have questions about our services after they have been received. We also provide ongoing services for many of our patients over a period of months or years for which our previous records are helpful. We retain our patient information for a minimum of seven years after the last contact to enable us to respond to those questions and provide these services (our regulatory body also requires us to retain our patient records for this period of time).
- If Toronto-Centre Naturopathic Medicine or its assets were sold, the purchaser would want to conduct a “due diligence” review of the Clinic’s 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 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 a part of some of these related or secondary purposes (e.g., by declining to receive notice of seminars or other events). We do not, however, have much choice about some 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 restricted area.
- Passwords are used on computers where personal information is stored.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Staff are 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, to protect your privacy, we do not want to keep personal information longer than necessary.

We keep our patient files for seven years. Our patient 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. We keep any personal information relating to our general correspondence (i.e., with people who are not patients) newsletters, seminars and marketing activities for about one year after the newsletter ceases publication or a seminar series is over.

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.

You Can Look at Your Personal Information

With only a few expectations, 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 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 access. We reserve the right to charge a nominal fee for such requests.

If there is a problem we may ask you 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?

Our Information Officer, Jonah Lusic, ND can be reached at:

Toronto-Centre Naturopathic Medicine
180 Dundas Street West, Suite 103
Toronto, ON M5G 1Z8
T: 416 598 8898
F: 416 597 3967

He 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 Information Officer. He 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.

If you have a concern about our professionalism or competence in these matters 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:

The Board of Directors of Drugless Therapy – Naturopathy
112 Adelaide Street East
Toronto, ON M5C 1K9
T: 416 866 8383
F: 416 866 2175
E: office@BDDTN.on.ca
www.boardofnaturopathicmedicine.on.ca

This policy is made under the Personal Information Protection and Electronic Documents Act. That 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 Information and 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 Information and Privacy Commissioner can be reached at:

112 Kent Street
Ottawa, ON K1A 1H3
T: 613 995 8210 (Toll-Free) 1 800 282 1376
F: 613 947-6850
TTY: 613 992 9190
www.privcom.gc.ca