



# PRIVACY POLICY

## WHAT IS PERSONAL INFORMATION?

Personal information relates to an identifiable individual. Personal information describes an individual's personal characteristics (e.g. gender, age, income, home address or phone number), their health (e.g. medical history, health conditions, health services received) or activities and views (e.g. occupation/profession, membership in a club or association, opinions expressed). Personal information is to be contrasted with business information (e.g. an individual's business address, business title and telephone number), which is not protected by privacy legislation.

## WHO WE ARE

Our organization, DMARehability offers a wide range of disability management and rehabilitation services. We employ a number of consultants who may, in the course of their duties, have limited access to personal information we hold. These individuals include; Social Workers, Rehabilitation Therapists, Occupational Therapists, Physiotherapists, Medical Doctors, Kinesiologists, Registered Nurses and Case Managers, Speech Language Pathologists, Physicians, and Vocational Rehabilitation Specialists.

## **WE COLLECT PERSONAL INFORMATION**

### **(Primary Purpose)**

For our clients and customers our primary purpose for collection of personal information is to provide our clients with the highest quality rehabilitation services to maximize recovery both medically and vocationally. Examples of the type of personal information we collect for those purposes include: name, home contact information, insurance benefit coverage, gender, age, language, education or training, occupation/profession, marital status, income, medical history, health measurements, samples or examination results, health conditions, assessment results and diagnoses, health services provided to or received by the person, health information collected in the course of providing services, prognosis or other opinions formed during assessment and treatment, compliance with assessment and treatment, reasons for discharge and discharge condition and recommendations, opinions expressed by the person, work hours, intentions (e.g. to utilize services, to change jobs) and letters written to the organization by the person.

We do not disclose personal information to the General Public. In order to collect information from our clients we will obtain written consent whenever possible.

We will inform our clients of the purpose(s) for which information is collected and used, and to whom personal information may be disclosed at the time of obtaining consent for collection.

### ***Secondary Uses and Disclosure of Personal Information***

Our organization reviews client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external consultants (e.g. auditors, lawyers, voluntary accreditation programs) may, on our behalf, do audits and continuing quality improvement reviews of our organization, including reviewing client files and interviewing our staff.

Our organization, or its professional staff, is regulated by provincial government regulations, The College of Occupational Therapists of Ontario, The Ontario Kinesiology Association, The Ontario College of Social Workers and Social Service Workers, The College of Physiotherapists of Ontario, The College of Physicians and Surgeons of Ontario, The College of Nurses of Ontario and The Canadian Association of Rehabilitation Professionals. These bodies 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 clients 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.

## **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 locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on all computers.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line or is anonymized or encrypted.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties in accordance with our privacy policy.
- External consultations and agencies with access to personal information must enter into privacy agreements with us regarding any information they may receive from us.

## **RETENTION AND DESTRUCTION OF PERSONAL INFORMATION**

We need to retain personal information for some time to ensure we can answer questions you might have about the services provided and for our own accountability to external regulatory bodies. However, (in order to protect your privacy) we do not want to keep personal information too long. We retain client files for ten years. Our client and contact directories are much more difficult to systematically

destroy, so we remove such information when we can if it does not appear we will be contacting you again. However, if you ask, we will remove such information immediately. You can make this request in writing by contacting our Information Officer, Jan King, at [jking@dmarehab.com](mailto:jking@dmarehab.com). We keep any personal information relating to our general correspondence with people who are not clients, newsletters, seminars and marketing activities for one year after the newsletter ceases publication or a seminar or marketing activity has been completed.

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

## **YOU CAN LOOK AT YOUR INFORMATION**

With some exceptions, 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 will also try to help you to 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 you with this access. We reserve the right to charge a nominal fee for such requests, where extensive photocopying is required, or other fees related to the retrieval of personal information are incurred.

We may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if 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 include in our file a brief statement from you on the matter and we will forward that statement to anyone else who received the earlier information.

### **DO YOU HAVE A CONCERN?**

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer at [jking@dmarehab.com](mailto:jking@dmarehab.com). She will acknowledge receipt of your complaint and ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

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:

Office of the Privacy Commissioner  
of Canada  
30, Victoria Street  
Gatineau, Quebec  
K1A 1H3

Toll-free: 1-800-282-1376  
Phone: (819) 994-5444  
TTY: (819) 994-6591

<https://www.priv.gc.ca/en/>

<https://www.dmarehability.com>