Laura Hild, RMT

PRIVACY POLICY

Privacy of personal information is an important principle at Laura Hild, RMT. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and 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:

I. information that relates to their personal characteristics (e.g. gender, age, income, home address or telephone number, ethnic background, family status)

II. their health (e.g. health history, health conditions, or health services received by them)

III. their activities and views (e.g. religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual)

Personal Information is different than business information (e.g. individuals business address and telephone number), which is not protected by privacy legislation.

Who We Are

Our organization, Laura Hild, RMT, includes at the time of writing one (1) massage therapist and support staff. We work with a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These include computer consultants, security and maintenance, bookkeepers and accountants, temporary workers to cover holidays, credit card companies, website managers, cleaners, insurance companies and lawyers. Your personal health information is securely located in a location that is accessed only by other health care practitioners that are directly associated with Laura Hild, RMT by engaging in a contract and confidentiality agreement. We also have their assurance that they follow appropriate privacy principles. Your consent will be obtained prior to sharing any information about your file to another health care practitioner. Written consent will be required for your consent to share information to any other third party.

Primary Purpose for the Collection of Personal Information

Like all massage therapists, we collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal information is to provide massage therapy treatment. For example, we collect information about a client’s health history, including their family history, physical condition, function and social situation in order to help us assess what their health needs are, to advise them of their options and then to provide the health care they choose to have. A secondary 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 client’s express consent, but this might occur in an emergency (e.g. the client is unconscious) or where we believe the client would consent if asked and it is impractical to obtain consent (e.g. a family member passing a message on from our client 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, our primary purposes for collecting personal information are to provide notice of special events (e.g. a seminar or conference) or to make them aware of massage therapy services in general or with Laura Hild, RMT in particular. For example, while we try to use work contact information where possible, we might collect home addresses, fax numbers and email addresses. We try to obtain consent before using any such personal information, but where this is not, for any reason, possible, we will upon request immediately remove any personal information from our distribution list.

About Contract Staff, Volunteers and Students

For people who are contacted to do work for us (e.g. temporary workers), our primary purpose for collecting personal information is to ensure we can contact them in the future (e.g. for new assignments, sending our references) and for necessary work-related communication (e.g. sending our paycheques, yearend, tax receipts). 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 in the case of a health emergency (e.g. a SARS outbreak) or to investigate a possible breach of law (e.g. if a theft were to occur or if there is a serious allegation against them by a client, fellow staff member or member of the public. If contract staff , volunteers or students 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.

Related and Secondary Purposes for the Collection of Personal Information

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:

 IV. to invoice clients or agencies for goods and services that were not paid for at the time;

 V. to process credit card payments or to collect unpaid accounts;

 VI. to advise clients that their product or service should be reviewed (e.g. to follow up on self-care prescriptions appropriate for their then current needs and to consider modifications;

 VII. to advise clients and others of special events or opportunities (e.g. a seminar, development of a new service, arrival of a new product) that we have available;

 VIII. our clinic 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, practice consultants, voluntary accreditation programs) may on our behalf do audits and continuing quality improvement reviews of our clinic, including reviewing client files and interviewing our staff;

 IX. Massage Therapists are regulated by the College of Massage Therapists on Ontario 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 clients, or other individuals, to support the concern (e.g. improper services).

 X. Also, various government agencies (e.g. Canada 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.

 XI. The cost of some goods/services provided by the organization to clients is paid for by third parties (e.g. WSIB, private insurance, Assistive Devices Program). 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 client entitlement to this funding.

 XII. Clients or other individuals we deal with may have questions about our goods or services after they have been received. We provide ongoing services for many of our clients over a period of months or years for which our previous records are helpful. We retain our client information for a minimum of ten years after the last contact to enable us to respond to those questions and provide these services (our regulatory College also requires us to retain our client records).

 XIII. If Laura Hild, RMT or its assets were to be sold, the purchaser would want to conduct “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 would not be able to remove or record personal information. Before being provided access to the 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.

 XIV. You can choose not to be part of some of these related or secondary purposes (e.g. by declining to receive notice of special events or opportunities, by paying for your services in advance). We do not, however, have control over 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:

XV. paper information is either under supervision or secured in a locked or restricted area;

XVI. electronic hardware is either under supervision or secured in a locked or restricted area;

XVII. passwords are used on computers and mobile devices. All of our cell phones are digital, which signals are more difficult to intercept;

XVIII. paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies;

XIX. electronic information is transmitted either through a direct line or is anonymized or encrypted;

XX. staff is trained to collect, use and disclose personal information as necessary to fulfill their duties in accordance with our privacy policy;

XXI. 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, we do not want to keep personal information too long in order to protect your privacy. We keep our client records for ten (10) 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 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 clients) newsletters, seminars and marketing activities for about six (6) months after the newsletter ceases publication or a seminar or marketing activity 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. Alternatively, we may send some or all of the client file to our client.

You Can Look at Your Information

With only a few 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 understand any information you do not understand (e.g. short forms, technical language, etc.). We will need to confirm your identity before providing you with this access. We reserve the right to charge a nominal fee for such requests. In some cases, we may ask you to put your request in writing. If we cannot give you access, we will let you know the reason within 30 days. 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, Laura Hild can be reached at:

Tel: 613-318-9557 Email: laurahildrmt@gmail.com

Laura will attempt to answer any questions or concerns you might have or, after receiving a complaint in writing, the information officer 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 professionalism or competence of our services or the mental or physical capacity of any of our professional staff we would ask you to discuss those concerns with us. However, if we cannot satisfy your concerns, you are entitled to submit your complaint to our regulatory body.

College of Massage Therapists on Ontario 1867 Yonge Street, Suite 810, Toronto, Ontario M4S 1Y5 telephone (416) 489-2626 (800)465-1933, facsimile (416)489-2625, cmto@cmto.com, www.cmto.com

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, Ontario, K1A 1H3 telephone (613)995-8210 (800)282-1376, facsimile (613)947-6850, TTY (613)992-9190, www.privcom.gc.ca.