

# Halton Region Services for Seniors Statement of Information Practices

## Personal Health Information Protection Act, 2004

Halton Region's Services for Seniors Division provides numerous programs for older adults and seniors. Three long term care homes (Post Inn Village, Creek Way Village and Allendale Village) provide living accommodations and care for seniors; and three adult day programs and four assisted living (supportive housing/supports for daily living) programs provide services that assist with mental and social stimulation as well as personal support with daily living activities.

In the course of providing these services, the Services for Seniors Division will often collect personal health information. On November 1, 2004, specific rules relating to the collection, use and disclosure of personal health information began applying to the health sector through provincial privacy legislation titled the *Personal Health Information Protection Act* (PHIPA). It is the Director of Services for Seniors responsibility to ensure that the personal health information practices of her employees, and others acting on her behalf, are in compliance with the PHIPA.

Individuals that use or have been in contact with Services for Seniors programs have a right to know how these programs collect, use and disclose their personal health information. Therefore, listed below are details regarding Services for Seniors information practices. Complete details about PHIPA can be obtained at one of the following websites:

- [Service Ontario e-laws](#)
- [The Information and Privacy Commissioner/Ontario](#)

This document replaces Halton Region's Personal Information Privacy Policy dated October 29, 2004 for the purposes of the written public statement requirement of section 16 of PHIPA.

### Collection of Personal Health Information

Personal health information is usually collected directly from individuals or their legal representatives. There may be instances where personal health information is collected from other sources such as external health care providers or agencies that the client has been dealing with; however, this is only done with the consent of the client, or in situations where legislation permits or requires the indirect collection.

The types of personal health information collected about individuals may include:

- name, date of birth, address and other contact information;
- health card number;
- health and health care history, including family history, if required; and

- record or history of doctor, hospital and specialist visits, including x-ray, laboratory and other medical results.

Policies and procedures are in place to ensure that Services for Seniors staff only collects the information it needs about clients and that the information collected is kept confidential and secure.

### **Use and Disclosure of Personal Health Information**

Personal health information is typically used and disclosed for the purpose of providing adequate assistance, living accommodations and health care. Some of the more specific uses and disclosures of personal health information include:

- to offer direct client care;
- to administer and manage the health care systems within Services for Seniors programs;
- to evaluate programs and services;
- to prepare statistics on the population of the facilities and programs;
- to assist with research programs;
- to assist with employee references, when necessary; and
- to enhance client care, by sharing information with other professional that have the ability to enhance client care.

### **Consent**

Most uses and disclosures of personal health information are done with either the express or implied consent of the client or the client's substitute decision-maker. There may be some situations where personal health information is used or disclosed without consent, but these situations are limited to circumstances where legislation permits or requires such uses and disclosures (see [Frequently Asked Questions - PHIPA](#) for more details).

Individuals have a right to withdraw a consent they have given, or to change the conditions of consent. Withdrawing consent will protect information from most future uses and disclosures, but may affect the provision of services and health care. To withdraw or change the conditions of consent, individuals should contact the Services for Seniors manager they have been dealing with. For those not aware of the appropriate contact, the [Frequently Asked Questions – PHIPA](#) section has tips on finding staff and programs.

### **Access to and Correction of Personal Health Information**

Individuals have a right to request access to, or a correction of, their personal health information. Although these rights only apply to formal requests (i.e. when the request has been submitted in writing), Services for Seniors is permitted to disclose or correct information in response to informal (i.e. oral) requests. For further details on how to submit a request for information maintained by one of the Region's long term care homes individuals should contact the manager they have been dealing with or the Administrator of the particular home.

Requests relating to information maintained by an Adult Day/Supportive Housing Program should be directed to:

Manager of Community Support Services  
185 Ontario St. South  
Milton, ON L9T 2M4  
Telephone: 905-825-6000  
Toll Free: 1-866-4Halton (1-866-442-5866)  
TTY: 905-827-9833  
Fax: 905-878-8797

It is important to note that access and correction requests can be denied partially or fully, in limited circumstances (see [Frequently Asked Questions - PHIPA](#) for more details).

### **Inquiries/Complaints**

Individuals that have questions or concerns about the collection, use or disclosure of their personal health information should contact the Services for Senior manager or administrator of the home/program they have been dealing with. For further details about Services for Seniors information practices or to discuss concerns about access or privacy that have not been addressed to their satisfaction, individuals can contact:

Director of Services for Seniors  
1151 Bronte Road  
Oakville, ON L6M 3L1  
Telephone: 905-825-6000  
Toll Free: 1-866-4Halton (1-866-442-5866)  
TTY: 905-827-9833  
Fax: 905-825-8836

OR

Freedom of Information and Privacy Coordinator  
Halton Region  
Regional Clerk's Office  
1151 Bronte Road  
Oakville, ON L6M 3L1  
Telephone: 905-825-6000  
Toll Free: 1-866-4Halton (1-866-442-5866)  
TTY: 905-827-9833  
Fax: 905-825-8838

In addition, individuals have a right to formally complain about the collection, use or disclosure of their personal health information to the Information and Privacy Commissioner/Ontario (IPC), which is an external oversight body. The IPC can be reached at:

2 Bloor Street East, Suite 1400

Toronto, ON M4W 1A8

Telephone: 416-326-3333

Toll Free: 1-800-387-0073

TCC/TTY: 416-325-7539

Fax: 416-325-9195

[www.ipc.on.ca](http://www.ipc.on.ca)