

## PRIVACY

### S. L. HUNTER SPEECHWORKS PRIVACY POLICY

*S.L. Hunter SpeechWorks* is committed to protecting the privacy of all personal information that is collected to enable us to provide quality speech, language, voice and cognitive services to our clients. In order to achieve this, it is our policy to collect, use and disclose personal information responsibly, to limit the information we collect to what we need, and to make our policies available to any interested party. 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 personal characteristics (e.g., gender, age, home address or phone number, language spoken, marital status), health (e.g., health history, health conditions, health services received) or activities and views (e.g. 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

*S.L. Hunter SpeechWorks* includes at the time of writing thirteen speech-language pathologists, three communicative disorders assistants and four administrators. To assist us in providing services, we use a limited number of consultants and agencies (such as computer consultants, office security, office cleaning, office maintenance, accountants, lawyers) that may, in the course of their duties, have limited access to personal information we hold. Similarly, *S.L. Hunter SpeechWorks* offers academic and volunteer placements to students, and these students may have limited access to personal information. We restrict consultants' and students' access to any personal information as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

### REASONS FOR COLLECTING PERSONAL INFORMATION ABOUT OUR CLIENTS

Like all speech-language pathologists, our primary purpose for collecting personal information is to provide speech, language, voice and/or cognitive services. We collect the following information (note that not all information is collected for all clients – we only collect what we need for each individual client):

Contact info (name, address, phone, email)  
Insurance info (claim number, policy number, adjuster, company)  
Lawyer info (name, law firm)  
Gender  
Age  
Language

Education / training  
Occupation, work hours  
Community involvements  
Marital status, children  
Home environment  
Health history  
Assessment results  
Health services provided to or received by the person  
Health and social information (including opinions expressed by the person) collected during the course of assessment or treatment  
Prognosis and other opinions formed during assessment or treatment  
Compliance with assessment and treatment  
Reasons for discharge, discharge condition and recommendations  
Correspondence from us to the person and/or other team members and/or payers

We collect this information in order to stay in contact with you, to help us assess what your needs are, to advise you of your options and then to provide you with the individualized health care you choose. This information also forms a baseline of health and social information so that in providing ongoing health services we can identify changes that are occurring over time.

We also collect contact and service provision information for the following secondary purposes:

- To differentiate clients with the same name.  
To secure payment for goods and services.
- To contact you to determine the need for follow-up services.
- To evaluate our services and the performance of our staff.
- To provide examples (anonymized) for teaching purposes.
- To allow us to meet our regulatory obligations. The College of Audiologists and Speech-Language Pathologists may inspect our records and interview our staff as a part of their regulatory activities in the public interest. Various government agencies (e.g., Canada Revenue Agency, Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. External regulators have their own strict privacy obligations. In these circumstances, we may consult with professionals (e.g., lawyers, accountants) who will investigate the matter and report back to us.
- To provide information to third party payers (e.g., WSIB, private insurance, Assistive Devices Program) when they pay for the goods and services you receive from us. We will obtain your consent to disclose your personal information in these instances except in instances where there is legislative authority to collect the information.
- To provide information for accounting and tax purposes.
- To answer any questions you may have about the service you received once it is concluded.
- To allow us to provide required information to a prospective purchaser if this practice or its assets are to be sold in order to conduct a “due diligence” review of our accounting and service files. 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 part of some of these secondary purposes (e.g., by declining follow-up contact, by paying for services in advance). We do not, however, have much choice about some of these purposes (e.g., external regulation).
- It would be rare for us to collect any personal information without your express consent, but this might occur in an emergency (e.g., you are unconscious) or where we believe you would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from you and we have no reason to believe that the message is not genuine).

## **PROTECTING PERSONAL INFORMATION**

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

Paper information in our clinics is either under supervision or secured in a locked or restricted area.

Any electronic information stored on portable devices (e.g., disks, memory sticks, laptop computers) is anonymized.

Any paper information that is taken outside of the clinic is anonymized and/or locked out-of-sight and/or under supervision.

Electronic hardware is either under supervision or secured in a locked or restricted area.

Our servers meet and exceed security standards and privacy requirements, both for physical and electronic access, encryption and back up. In addition, three levels of passwords are required to access health data and all three levels are changed every three months.

Paper information is sealed and transmitted by reputable companies.

Special care is taken when transmitting electronic information. Unless you have specifically requested otherwise, confidential information is password protected when being emailed, or sent via secure encryption such as Secure Docs. Faxes are sent with cover sheets and are transmitted to confirmed numbers. Where we are unsure of the security of the electronic transfer of information, identifying information is removed.

Our staff is 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 demonstrate their adherence to privacy laws.

Reports and/or progress notes are only sent to team members for whom the information will be helpful, and only with your written consent.

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

We need to retain personal information for some time to ensure that we can answer your questions about the services provided and for our own accountability to external regulatory bodies.

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 18th birthday. Working notes and recordings are destroyed regularly throughout our intervention, as we transfer the information into progress notes and reports. All remaining files and tapes are destroyed on or shortly after the 10-year mark. This includes your contact and health information.

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. We destroy audio and videotape information by erasing it or tearing up the tape.

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

With only a few exceptions, you have the right to see what personal information we hold about you. We can help you understand any information you do not understand (e.g., short forms, technical language, etc.). We will of course need to confirm your identity before providing this access. We reserve the right to charge a nominal fee for such requests.

If there is a problem, we may ask for the request in writing. If we cannot provide access, we will tell you within 10 days if at all possible and explain the reason, as best we can, as to why we cannot provide 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 our professional opinions. We may ask for documentation if you feel that our records contain any incorrect information. Where we agree that a mistake was made on our part, 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.

## **QUESTIONS OR CONCERNS?**

Our Information Officer, Shanda Hunter-Trottier, can be reached at:

Address: 4B-5195 Harvester Road, Burlington, ON L7L 6E9

Phone: 905-637-5522 Toll free: 877-887-5522

Fax: 905-637-4995

Email: [slhunter@slhunter.ca](mailto:slhunter@slhunter.ca)

She will attempt to answer any questions or concerns.

Formal complaints about our privacy practices can be made in writing to our Information Officer at the address above. She will acknowledge receipt of the complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

Concerns about the professionalism or competence or the mental or physical capacity of any of our professional staff should be discussed with us. However, if we cannot satisfy these concerns, a complaint can be made to our regulatory body, the College of Audiologists and Speech-Language Pathologists of Ontario:

Address: 3080 Yonge St., Suite 5060, Toronto, Ontario, M4N 3N1

Phone: 416-975-5347, 800-993-9459

Fax: 416-975-8394

Email: [caslpo@caslpo.com](mailto:caslpo@caslpo.com)

This policy is made under the Personal Information Protection and Electronic Documents Act and the Personal Health Information Protection Act. These are complex Acts and provide 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 ombudsperson for privacy disputes. The Office of the Privacy Commissioner can be reached at:

Address: 112 Kent St., Ottawa, Ontario, K1A 1H3

Phone: 613-995-8210, 800-282-1376

Fax: 613-947-6850

TTY: 613-992-9190

Web: [www.privcom.gc.ca](http://www.privcom.gc.ca)