

## **Nest Physio Privacy Policy**

Privacy of personal information is an important principle to the organization Nest Physio. We are committed to collecting, using, and disclosing personal information responsibly and only to the extent necessary for the physiotherapy services we provide. We try to be open and transparent about how we handle personal information. This document describes our privacy policies.

### **What is Personal Health Information?**

Personal information is information about an identifiable individual. Personal information includes information that relates to: an individual's personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status); health (e.g., health history, health conditions, health services received by them); or, activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is different from business information (e.g., an individual's business address and telephone number). This is not protected by privacy legislation.

### **Who We Are**

Nest Physio is owned and operated by Kate Jones. At the time of writing this policy, there are no other employees of Nest Physio. We may use a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These may include computer consultants, bookkeepers and accountants, lawyers, temporary workers to cover holidays and leaves of absences, credit card companies, and website managers. 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 Health Information**

Like all physiotherapy organizations, we collect, use and disclose personal information in order to serve our clients. For our clients, the primary purposes for collecting personal information is to provide physiotherapy assessments and treatments. For example, we collect information about a client's health history, including their family history, physical condition and function, and social situation in order to help us assess what their physiotherapy needs are, to advise them of their options, and to provide physiotherapy services 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.

We also collect, use and disclose personal health information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

Related Purpose #1: To obtain payment for services or goods provided.

Related Purpose #2: To conduct quality improvement and risk management activities. We review client files to ensure that we provide high quality services, including assessing the performance of our staff. External consultants (e.g., auditors, lawyers, practice consultants, voluntary accreditation programs) may conduct audits and quality improvement reviews on our behalf.

Related Purpose #3: To promote our organization, new services, special events and opportunities (e.g., a seminar or conference) that we have available. We will always obtain express consent from the client prior to collecting or handling personal health information for this purpose.

Related Purpose #4: To comply with external regulators. Physiotherapists are regulated by the College of Physiotherapists of Ontario who may inspect our records and interview our staff as a part of its regulatory activities in the public interest. The College of Physiotherapists of Ontario has its own strict confidentiality and privacy obligations. 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 illegal behaviour to the authorities. In addition, we may be required by law to disclose personal health information to various government agencies (e.g., the Ministry of Health, and Long Term Care, children's aid societies, Canada Customs and Revenue Agency, Information and Privacy Commissioner, Ontario, etc.).

You can choose not to be part of some of these related or secondary purposes (e.g., by declining special offers or promotions, by paying for your services in advance). 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 important 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.
- Strong passwords are used on all computers and mobile devices. Information is most often stored on a secure cloud server operated by Jane App, our booking, charting, and billing platform, rather than on the computer hard drive or mobile devices. In the occasional case that information is stored on a computer hard drive, the computer will be stored in a supervised area or restricted area.
- Paper information is transferred through sealed, addressed envelopes or boxes by reputable companies with strong privacy policies
- Electronic information is either anonymized or encrypted before being transmitted
- Our staff members are trained to collect, use, and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy
- We do not post personal information about clients on social media sites and our staff members are trained on the appropriate use of social media

- External consultants and agencies with access to personal information must enter into privacy agreements with us

### **Openness about the Personal Information Process**

The organization must make its personal information Privacy Policy available to the public. Individuals must be able to obtain and understand this Privacy Policy without unreasonable effort. Staff are trained to provide the Privacy Policy document to anyone who requests it and it is available on the website listed in the footer of this page. A summary of the privacy policy titled “Our Privacy Commitment to You” will be provided to you prior to obtaining consent for assessment.

### **Right to Access Personal 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, if we do not know you, before providing you with this access. We reserve the right to charge a nominal fee for such requests.

If there is a problem, we may ask you to 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, where appropriate, notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will agree to include in our file a brief statement from you on the point and, as appropriate, we will forward that statement to anyone else who received the earlier information.

### **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.

We keep our client files for at least ten years from the date of the last client interaction or from the date the client turns or would have turned 18.

We destroy paper files containing personal health information by cross-cut shredding. We destroy electronic information by deleting it in a manner that it cannot be restored. When hardware is discarded, we ensure that the hardware is physically destroyed or the data is erased or overwritten in a manner that the information cannot be recovered.

## **Do You Have a Concern?**

Our Information Officer, Kate Jones, can be reached at [katejonesphysio@gmail.com](mailto:katejonesphysio@gmail.com) to address 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. She will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal written decision with reasons.

If you have a concern about the 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. If we cannot satisfy your concerns, you are entitled to complain to our regulatory body:

COLLEGE OF PHYSIOTHERAPISTS OF ONTARIO  
375 University Avenue, Suite 901 Toronto, ON, M5G 2J5  
Phone: 416-591-3828, 1-800-583-5885 | Fax: 416-591-3834  
General email: [info@collegept.org](mailto:info@collegept.org) | Web: [www.collegept.org](http://www.collegept.org)

For more general inquiries, the Information and Privacy Commissioner of Ontario oversees the administration of the privacy legislation. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

INFORMATION AND PRIVACY COMMISSIONER OF ONTARIO  
2 Bloor Street E, Suite 1400, Toronto, ON, M4W 1A8  
Phone: 416-326-3333 | 800-387-0073 | Fax: 416- 325-9195 | TTY (416) 325-7539  
Web: [www.ipc.on.ca](http://www.ipc.on.ca)