



PRIVACY PRINCIPLES

Headwaters has adopted the 10 Privacy Principles established by the Canadian Standards Association's Model Code for the protection of Personal Health Information (PHI) and Personal Information (PI). The principles are:

ACCOUNTABILITY

Headwaters is responsible for the PHI and PI in its custody or under its control and has designated a Chief Privacy Officer (CPO) who is accountable for the organization's compliance with the privacy principles and the provincial legislations.

IDENTIFYING PURPOSE

Headwaters identifies and makes public the purposes, for which PHI and PI is collected, used and disclosed at or before the time the information is collected.

Information notices are posted across the hospital which identify reasons why we collect, use and disclose PHI and PI.

CONSENT FOR COLLECTION, USE AND DISCLOSURE

We obtain an individual's consent for collection, use and disclosure of their PHI and PI, except where otherwise required or permitted by law.

Depending on the circumstances and the type of PHI and PI collected, Headwaters may rely on implied or express consent.

If you do not wish your information to be used or shared, you have the right to refuse to provide all or part of the information to us at the time we request the information or any time afterwards.

We may not be able to fulfill your wishes if they impact our ability to deliver quality health care to you or if we are legislated to use or disclose the information to which you object. In these cases we will discuss the impact of your objection with you.

[Click here](#) to learn more about withdrawing your consent.

LIMITING COLLECTION

Headwaters limits the amount and type of PHI and PI collected to that which is necessary for the purposes identified. Information will be collected through fair and lawful means.

LIMITING USE, DISCLOSURE AND RETENTION

PHI and PI shall not be used or disclosed for purposes other than for which it was collected, except with the consent of the individual, as required by law or as recognized in the Act. PHI and PI shall be retained only as long as necessary for the fulfillment of those purposes.

ACCURACY

Headwaters will take reasonable steps to ensure that PHI and PI is accurate, complete and up-to-date as is necessary for the purpose for which it is collected and used. You can help us with this when you register for services by having the full name and current contact information for your family physician. If you have registered with us previously, we will ask to confirm your registration information to ensure it is still current and correct.

SAFEGUARDS

Headwaters takes reasonable steps to ensure your PHI and PI is protected. Some of the specific steps we take to protect your privacy while delivering safe, high-quality care are:

Administrative Safeguards: i.e., privacy pledge, education and training, auditing schedules, privacy policies and procedures

Physical Safeguards: i.e., locked doors, locked file cabinets, confidential shred bins, staff ID badges

Technical Safeguards: i.e., unique usernames and passwords, encryptions, firewalls, restricted access to information

OPENNESS

Headwaters makes available to individuals specific information about its policies and practices relating to the management of PHI and PI and privacy practices.

INDIVIDUAL ACCESS

Upon request, an individual will be informed of the existence, use and disclosure of their PHI and PI. Headwaters will provide the individual with access to, and the ability to correct, their PHI and PI in a manner consistent with applicable legislations.

Individuals are able to challenge the accuracy and completeness of the information and may request to have it amended.

[Click here](#) to learn more about requesting access to your medical records. [Click here](#) to learn more about requesting access to your personal information.

CHALLENGING COMPLIANCE

An individual can address a challenge concerning compliance with the above principles, to the Headwaters Chief Privacy Officer. For more information about our privacy practices or to raise a concern you may have about these practices, please contact:

Regional Privacy Office

201 Georgian Drive

Barrie, ON L4M 6M2

Email: privacy@headwatershealth.ca

Tel: 705.792.3318 or 519.941.2410 extension 2578

Fax: 705.797.3110

You may also make a complaint to the Information and Privacy Commissioner of Ontario if you believe we have violated your privacy rights. The Commissioner can be reached at:

Information and Privacy Commissioner/Ontario
2 Bloor Street East, Suite 1400
Toronto, ON M4W 1A8
Tel: 416-326-3333 or toll free at 1-800-387-0073
Fax: 416-325-9195
Email: commissioner@ipc.on.ca
Website: www.ipc.on.ca