

NUTRIGAL NUTRITION COUNSELLING PRIVACY POLICY

WHAT IS PERSONAL INFORMATION?

Personal information is information about an identifiable individual. Personal information includes information that relates to one's personal characteristics (i.e. gender, age, health conditions, health services received) or their activities and views (i.e. religion, politics, opinions expressed by an individual). Personal information is contrasted with business information (i.e. an individual's business address and telephone number), which is not protected by privacy legislation.

Nutrigan Nutrition Counselling is owned and operated by sole practitioner, Kelly Greer, RD. Personal information is collected, used and disclosed responsibly, and only to the extent necessary for the services provided.

COLLECTION OF PERSONAL INFORMATION: *PRIMARY PURPOSES*

Like all services from registered dietitians, information is collected, used and disclosed in order to serve the needs of clients. For clients of Kelly Greer, RD, the primary purpose for collecting personal information is to provide services related to nutritional conditions (i.e. assessment and treatment of nutrient deficiencies, gastrointestinal disorders, growth problems, food allergies and eating disorders, etc.). Examples of the type of personal information collected for those purposes include home and work contact information (in the case of a last minute cancellation), health history, including family history, developmental milestones, medical history, and personal characteristics such as age, language, ethnic background, occupation, education/training and housing. This information is collected to help assess and treat issues related to nutritional status and intake. In certain instances it will be necessary to collect information from a family member on behalf of the client, such as a client or child who has aphasia or does not speak English. In these situations, when appropriate, every effort will be made to make the client aware of information that has been shared.

COLLECTION OF PERSONAL INFORMATION: *RELATED AND SECONDARY PURPOSES*

Like most health organizations, information is collected and disclosed for related or secondary purposes as follows:

- To invoice clients for services that were not paid at the time they were incurred and to collect unpaid accounts.
- For quality assurance and evaluation of services provided. In addition, external consultants (i.e. auditors, lawyers) may perform audits and quality reviews of the dietitian's practice, including reviewing clients' files.
- Registered dietitians are regulated by the College of Dietitians of Ontario, who may inspect client records and interview the dietitian as part of the regulatory activities in the public interest. In addition, as a professional, the dietitian is required to report serious misconduct, incompetence or incapacity of other regulated practitioners. Also, Kelly Greer believes that that information that suggests serious illegal behaviour should be reported to the authorities. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about the dietitian's clients, or other individuals, to support the concern. These regulators, such as the Canada Customs and Revenue Agency, the Privacy Commissioner, the Human

Rights Commission, etc., have the authority to review files as part of their mandates. In these circumstances, the dietitian may consult with professionals (accountants, lawyers) who will investigate the matter.

- The cost of some services provided by the dietitian is paid for by third parties (i.e. private insurance). Third party payers often have your consent or legislative authority to direct the dietitian to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.
- Clients or other individuals the dietitian deals with may have questions about services provided after they have been received. Services are provided to many clients over periods of months or years, and previous records are often helpful. Client information is retained for a minimum of ten years after the last contact to enable response to questions, and provide on-going service. Retention of client information for this time frame is also a requirement of the regulatory college.
- If Family Nutrition Counselling or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the organization’s records to ensure that it is a viable business that has honestly been portrayed to the purchaser. This due diligence may involve some review of 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 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.

PROTECTING PERSONAL INFORMATION

Protecting your personal information is of utmost importance, and the following steps have been taken to ensure this protection:

- Paper information is either under supervision or out of sight, and is secured in a locked or restricted area.
- Electronic hardware is either under supervision or out of sight, and is secured in a locked or restricted area. Password protection is used on computers and individual files.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies or Canada Post.
- Personal information is only collected, used and disclosed as necessary to fulfill necessary duties an in accordance with the privacy policy.
- External consultants and agencies with access to personal information must enter into privacy agreements with the organization.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

In accordance with regulations set by the College of Dietitians of Ontario, records containing personal information are kept for a minimum of ten years after last contact, by phone or in person, with the client. Paper files containing personal information are destroyed by shredding.

ACCESSING YOUR INFORMATION

With only a few exceptions, you have the right to see what personal information is held about you. Your identity will need to be confirmed (i.e. if you are the mother of a client and only the father is known to the dietitian) before you are provided with access. The dietitian reserves the right to charge a nominal fee for such requests.

If there is a dispute or a problem, you may be requested to submit your request in writing. If access cannot be granted, you will be notified within 30 days and the reason for the denial of access will be detailed.

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 to any professional opinions formed. You may be asked to provide documentation that the information in your file is inaccurate. Where it is agreed that a mistake has been made, the correction will be made and anyone to whom this information has been sent will be notified. If there is not an agreement that a mistake has been made, you will still be able to add a brief statement to your file on the point and that statement will be forwarded to anyone else who received the earlier information.

DO YOU HAVE A CONCERN?

The information officer, Kelly Greer, can be reached at:
1204 Kingston Road
Toronto, Ontario
M1N 1N8
Phone: 416-694-4800

If you wish to make a formal complaint about the organization's privacy practises, you make submit it in writing to the Information Officer. Your complaint will be acknowledged, investigated promptly, and you will be provided with a formal decision and reasoning in writing.

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 ombudsman for privacy disputes. The Privacy Commissioner can be reached at:

112 Kent St.
Ottawa, ON K1A 1H3
Phone: 613.995.8210
Toll-free: 1.800.282.1376
Fax: 613.947.6850
TTY: 613.992.9190
www.privcom.gc.ca

CONSENT FORM

I hereby consent to the following treatment by Kelly Greer, Registered Dietitian:

Nutritional counselling which includes meal planning, recommendation of nutritional supplements, nutritional education and behavioural modification.

I have been informed of the following:

- About the treatment
- Why I would benefit from following the treatment
- Alternatives to the treatment
- The important effects, risks and side-effects of the treatment

The treatment has been explained to my satisfaction and I have no further questions. My consent is voluntary.

SIGNATURE OF CLIENT

SIGNATURE OF WITNESS

PRINT NAME OF CLIENT

PRINT NAME OF WITNESS

DATE: _____