



## **PRIVACY STATEMENT**

### **Southbridge Health Care LP Privacy Statement - Respecting Your Privacy**

Protecting the privacy of your personal information and acting responsibly with all information provided to us is fundamental to Southbridge Health Care LP's values and mission. We are committed to protecting the privacy of our residents and the confidentiality and security of all personal health information entrusted to us. Our policies and practices regarding the collection, use, and retention of personal information are guided by best practices and are compliant with all applicable legislation.

The Personal Health Information Protection Act, or "PHIPA," is the provincial law that governs the collection, use and disclosure of personal health information. All Southbridge Health Care LP homes support and promote the intent of this Act and its purpose which is to keep personal health information confidential and secure, while allowing for the effective delivery of health care.

Personal Health Information, or "PHI," includes any identifying information about an individual's health or health care, and includes, but is not limited to, clinical and medication information, health history, health card number and physician name.

PHIPA prescribes certain obligations on Southbridge Health Care LP as the Health Information Custodian to protect personal health information and to collect and use it within defined circumstances. All Southbridge Health Care LP staff receive education on these obligations and take them very seriously.

Southbridge Health Care LP long-term care and retirement homes collect personal health information about our residents, either directly from the resident or from a person acting on their behalf. The information that we collect may include, for example, resident photographs (for identification purposes), name, date of birth, address, health history, and records of the care a resident receives in one of our Homes. We may also collect personal health information from other sources, such as a previous health care provider, if this information is needed by us to provide residents with necessary treatment and care. Southbridge Health Care LP will only collect information which is required and permissible to collect as per legislation and is necessary to ensure that we provide you with the best health care possible.

We use and disclose resident personal health information for a variety of reasons, as outlined below, all of which are permitted by legislation. When we use personal health information for resident care, only the staff members involved in that care may access the information. Staff at Southbridge Health Care LP homes may access and/or disclose personal health information for the following reasons, to provide care, conduct risk management activities, education and training purposes, to comply with legal and regulatory requirements, internal operations, obtain payment for treatment and care, conduct quality improvement activities and/or to fulfill other purposes permitted or required by law. In order to provide care in our homes, we utilize electronic health records. These systems are



put into place to improve safety and quality of care, and you can rest assured that your personal health information will be stored and shared securely on health information databases accessible only by authorized health care providers.

Southbridge Health Care LP homes will not use or disclose your personal health information for any marketing or fundraising purposes. Our own, internal resident-services staff may access and use contact information for follow-up and to enquire about satisfaction with our services. Unless you tell us differently, we may let visitors or callers know that a resident resides in one of our Homes. If you do not wish us to release this information, please let us know and we will put measures in place to ensure that we do not release this information or do so only under certain circumstances, as identified by you or your substitute decision maker.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

We are committed to keeping all resident information safe and confidential. All Southbridge Health Care LP long-term care and retirement homes take steps to protect personal health information from theft, loss and unauthorized access, copying, modification, use, disclosure, and disposal. The protection of Personal Health Information includes many elements, ranging from physical safeguards (such as locked filing cabinets and restricted access to offices where personal health information is held), to technical safeguards (such as the use of passwords, encryption, and audits), to administrative safeguards (such as policies and procedures, employee education, and the use of confidentiality agreements with our agents).

Residents and their substitute decision makers may access and correct personal health information or withdraw consent for some of the above uses by making a simple request to the Executive Director of the home in which you reside (subject to legal exceptions, such as where disclosures are required by law). You will be asked to put your request in writing, to enable us to verify the existence of the record in question and to locate it for you. We will respond to access requests within the timeframes set by the PHIPA, and at a reasonable cost.

When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, the Home will correct the information as required. Otherwise, the individual may require that a statement of disagreement be attached to the record of personal information.

Southbridge Health Care LP and all of its homes will always obtain your consent regarding the collection, use and disclosure of your personal health information. In general, a custodian who provides health care, such as a long-term care or retirement home, is permitted to collect, use, and disclose personal health information, on the basis of implied consent, for the purpose of providing health care. This consent extends to the agents of the home, and other health information custodians with whom we collaborate to provide a resident's care. For certain matters, including those prescribed by the PHIPA, we will seek express consent from a resident or their SDM. Consent for the collection, use, and disclosure of personal health information may be expressly withheld or



withdrawn by a resident or their SDM, although such a withdrawal cannot be applied retroactively.

If you have any questions with regards to this Privacy Statement or any of Southbridge Health Care LPs privacy policies, please contact our Privacy Officer.

Privacy Officer  
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