

## **PRIVACY POLICY OF SANDRA GABRIELE**

Registered Dietitian  
3095 Glen Erin Drive, Unit 4  
Mississauga, ON L5L 1J3

Privacy of personal information is an important principle to **Sandra Gabriele, RD**. I am committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the nutrition services I provide. I try to be open and transparent about how I handle personal information. This document describes my privacy policies.

### **WHAT IS PERSONAL INFORMATION?**

Personal health information is information about an identifiable individual. Personal health information includes information that relates to:

- the physical, nutritional or mental health of the individual (including family health history);
- the provision of health care to the individual (including identifying the individual's health care provider(s));
- a plan of service under the Home Care and Community Services Act, 1994;
- payments or eligibility for health care or coverage for health care;
- the donation or testing of an individual's body part or bodily substance;
- the individual's health number; or
- the identification of the individual's substitute decision-maker.

### **WHO I AM**

I am **Sandra Gabriele**, a Registered Dietitian and I am the health information custodian for the purposes of PHIPA (Personal Health Information Protection Act, 2004).

I use a number of consultants and agencies that may, in the course of their duties, have limited access to personal health information I hold. These include office support staff, computer consultants, office security and maintenance, accountants, lawyers, credit card companies. 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 I Collect Personal Health Information**

I collect, use and disclose personal information in order to serve my clients. For my clients, the primary purpose for collecting personal health information is to provide nutrition therapy. For example, I collect information about a client's health history, including their family history, physical condition and function and social situation in order to help me assess what their nutrition care needs are, to advise them of their options and then to provide the nutrition care they choose to have.

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

- To obtain payment for services or goods provided. Payment may be obtained from the individual, WSIB, private insurers or others.

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- **Invoicing and Collection:** To invoice clients for services that is not paid for at the time of the appointment, and to collect unpaid accounts. Personal information collected (that is not already collected as a part of the primary purpose) will include name, home address, description of service provided, etc. Contact information including name, address and phone number may be disclosed for the purposes of collections. This only applies to clients who have not paid at the time of the service or who pay by personal cheque.
- **Quality Control and Risk Management:** To conduct quality improvement and risk management activities. I review client files to ensure that I provide high quality services. External consultants (e.g., auditors, lawyers, practice consultants, voluntary accreditation programs) may conduct audits and quality improvement reviews on our behalf.
- **External Regulation:** To comply with external regulators. Our professionals are regulated by [e.g., the College of Dietitians of Ontario] who may inspect my records and interview staff as a part of its regulatory activities in the public interest. The College of Dietitians of Ontario has its own strict confidentiality and privacy obligations. In addition, as professionals, I will report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or my own. Also, I believe that I should report information suggesting illegal behaviour to the authorities. In addition, I 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.).
- **Promoting my Clinic:** To promote new services, special events and opportunities (e.g., a seminar or conference) that I have available. I will always obtain express consent from the client prior to collecting or handling personal health information for this purpose.
- **Education of Students:** I value the education and development of future and current professionals. Occasionally I will have a student sit in on counselling sessions for the purpose of education. I will also review client records in order to educate students about the provision of health care.

You can choose not to be part of some of these related or secondary purposes. I do not, however, have much choice about some of these related or secondary purposes (e.g. external regulation).

### **PROTECTING PERSONAL INFORMATION**

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

- Paper information is secured in a locked file cabinet
- Electronic hardware is secured by password access
- Electronic personal information is stored or transported on an encrypted USB Iron key
- Paper information is transported through a sealed envelope, marked private and confidential
- Electronic information is transmitted through fax

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- External consultants, agencies and students with access to personal information must enter into privacy agreements with me
- Transfer of electronic information by email will not be initiated by me without your expressed consent. If necessary to communicate via email safeguards to protect personal health information include, not including any sensitive personal health information in the message, ensuring the message is anonymized.

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

I need to retain personal information for some time to ensure that I can answer any questions you might have about the services provided and for my own accountability to external regulatory bodies. However, I do not want to keep personal information too long in order to protect your privacy. I keep my client files for ten years after the last entry or ten years following a child's eighteenth birthday. I destroy paper files containing personal information by shredding. I destroy electronic information by deleting it. Alternatively, I may send some or the entire client file to my client.

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

With only a few exceptions, you have the right to see what personal information I hold about you. Often all you have to do is ask. I can help you identify what records I might have about you. I will also try to help you understand any information you do not understand (e.g. short forms, medical terms, etc.). I will need to confirm your identity if I do not know you, before providing you with this access. I reserve the right to charge a nominal fee for such requests.

If there is a problem, I may ask you to put your request in writing. If I cannot give you access, I will tell you within 30 days if at all possible and tell you the reason, as best I can, as to why I cannot give you the 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 I may have formed. I may ask you to provide documentation that my files are wrong. Where I agree that I made a mistake, I will make the correction and notify anyone to whom I sent the information. If I do not agree that I have made a mistake, I will still agree to include in my file, a brief statement from you on the point and I will forward that statement to anyone else who received the earlier information.

### **DO YOU HAVE A CONCERN?**

I, **Sandra Gabriele**, am the Information Officer and can be reached by phone: **(289) 259-4517** to address any questions or concerns you may have.

If you wish to make a formal complaint about my privacy practices, you may make it in writing to me. I will acknowledge receipt of your complaint, ensure that it is investigated promptly, and that you are provided with a formal decision and reasons in writing.

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If you have a concern about the professionalism or competence of my service or my mental or physical capacity, I would ask you to discuss those concerns with me. However, if I cannot satisfy your concerns, you are entitled to complain to my regulatory body:

### **College of Dietitians of Ontario**

5775 Yonge Street  
Suite 1810, Box 30  
Toronto, ON, M2M 4J1  
(416) 598-1725 or 1-800-668-4990  
[information@collegeofdietitians.org](mailto:information@collegeofdietitians.org)

You also have the right to complain to the Information and Privacy Commissioner of Ontario at the address below if you have concerns about my privacy practices or how your personal health information has been handled:

### **Information and Privacy Commissioner of Ontario**

2 Bloor Street East, Suite 1400, Toronto, Ontario M4W 1A8  
Telephone: Toronto Area (416/local 905): (416) 326-3333  
Long Distance: 1 (800) 387-0073 (within Ontario) TDD/TTY: (416) 325-7539  
FAX: (416) 325-9195  
[www.ipc.on.ca](http://www.ipc.on.ca)