

Fanshawe College Oral Health Clinic – Privacy Code
Consent for Collection, Use and Disclosure of Personal Information and Personal Health Information

The Fanshawe College Oral Health Clinic (the “**Oral Health Clinic**”) understands the importance of safeguarding personal health information to support quality client care. Our information practices align with regulatory requirements defined by privacy legislation, including the provincial Personal Health Information Protection Act (**PHIPA**) and the federal Personal Information Protection and Electronic Documents Act (**PIPEDA**). To help you understand how we are protecting your personal health information, we have outlined below how our clinic is collecting, using and disclosing your personal information.

What is Personal Health Information?

Personal health information is a broad term. Within the context of the Oral Health Clinic, this information may include:

- Personal information such as date of birth, address, family physician/specialists, emergency contact
- Social and financial information such as third-party insurer, statement of account
- Medical history information, including medical conditions and medications, such as natural remedies and supplements
- Dental history information, including client complaints, dental providers, and past dental treatments
- Current intra and extra oral findings, including periodontal and dental status
- Radiographs, photos, video, and study models

Purposes of Collection and Use:

The Oral Health Clinic will collect, use and disclose information about you for the following purposes:

- To provide students and clinical faculty with the necessary data to formulate a care plan, to implement dental hygiene and dental assisting treatment and services, and to evaluate the outcomes of dental hygiene and dental assisting care;
- To provide learning opportunities for students and clinical faculty;
- To assess your health needs and provide safe and efficient dental care;
- To enable us to contact and maintain communication with you to distribute health care information and to book and confirm appointments;
- To communicate with other treating health care providers, including other dentists, physicians, pharmacists and lab technicians;
- To complete and submit dental claims for third party adjudication and payment;
- To comply with legal and regulatory requirements;
- To deliver your charts and records to the Oral Health Clinic’s insurance carrier to enable the insurance company to assess liability and quantify damages, as necessary;
- To invoice for goods and services;
- To process credit card payments;
- To collect unpaid accounts.

Additionally, information collected during your care at the Oral Health Clinic may be used anonymously for the following purposes:

- For academic research;
- For teaching and demonstrating purposes on an anonymous basis;
- To satisfy a request from the College of Dental Hygienists of Ontario (CDHO) or the Royal College of Dental Surgeons of Ontario (RCDSO);
- For documentation purposes relating to the accreditation process by the Commission on Dental Accreditation of Canada;
- For the Oral Health Clinic's internal quality improvement activities.

Please note that every effort will be made to collect the minimum necessary amount of information to provide care, and all information collected will be directly related to dental hygiene and dental assisting care at the Oral Health Clinic. Personal health information will not be shared with individuals who do not have a need to know the information.

Purposes of Disclosure:

Students and staff of the Oral Health Clinic understand they have a legal obligation to protect all personal health information. However, to provide quality client care, it may be necessary to share personal and personal health information with a third-party who is within the circle of care. This may include a family physician, medical specialists and dentists or dental specialists. Verbal or written consent will be obtained and recorded in the client record prior to sharing this information. Third parties can also include private insurers or government-funded program administrators (Accerta) who may require additional information to process claims, such as treatments provided, pre-determination of benefits estimates and x-rays.

Privacy Procedures and Related Legislation:

Fanshawe College provides the following safeguards to protect your personal information and personal health information at the Oral Health Clinic:

- All students and staff are trained annually on privacy legislation requirements and privacy procedures specific to our Oral Health Clinic to support the legislation;
- Administrative controls such as encryption, passwords and internal procedures are used to identify individuals who have accessed a client's personal information and when to alert the Oral Health Clinic's Privacy Officer in cases of a privacy breach;
- Client charts are audited on a regular basis to ensure appropriate recordkeeping practices are maintained;
- In the event of a privacy breach, clients will be contacted as soon as possible with information pertaining to the nature of the breach, including the personal information that was compromised and the steps that will be taken to rectify the situation;
- If a privacy breach occurs, the Privacy Officer will file a report with the Information Privacy Commissioner of Ontario as per PHIPA and launch an internal investigation. The Privacy Officer may make recommendations and enforce additional procedures to ensure the security of the clients' personal information.

Retention and Storage Procedures:

Client records are retained and stored according to requirements set out in the legislation, including the RCDSO Guidelines and the CDHO Record Keeping Regulation. All records are stored securely onsite and retained for a minimum of 10 years after the last client encounter. Paper records are stored in a locked cabinet, with a process to ensure that records used for client care are returned to the locked cabinet after

use. For paper records of clients who are no longer actively receiving care at the Oral Health Clinic, secure off-site storage of records will be maintained by Fanshawe College as outlined by the CDHO Records Keeping Regulation and RCDSO Guidelines for off-site storage of dental records.

Client Access Rights, Correction and Complaints Procedures:

All clients accessing services at the Oral Health Clinic have the right to see and obtain a copy of the information collected about them. Depending on the amount and extent of information that the client requests, the Oral Health Clinic reserves a right to charge a reasonable fee for such request.

A client may contact the Oral Health Clinic's Manager, Health and Wellness Clinics for the following purposes:

- To request to see or obtain a copy of his/her personal information in the Oral Health Clinic client records;
- To correct his/her personal information in the Oral Health Clinic client records, which the client believes to be inaccurate or incomplete;

A client may contact the Oral Health Clinic's Privacy Officer for the following purpose:

- To pose an inquiry, concern or complaint regarding the privacy practices of Fanshawe College and/or the personal information gathered as a client of the Oral Health Clinic.

For more information about privacy practices at the Oral Health Clinic, please contact:

Manager, Health and Wellness Clinics

Fanshawe College Oral Health Clinic

A1001, 1001 Fanshawe College Blvd

London, ON N5Y 5R6

Telephone: 519-452-4430 x5578 Email: hwcmanger@fanshawec.ca

Privacy Officer

Fanshawe College

1001 Fanshawe College Blvd

London, ON N5Y 5R6

Telephone: 519-452-4430 x4021 Email: privacy@fanshawec.ca

Reporting to the Office of the Information and Privacy Commissioner of Ontario:

If you are dissatisfied with the manner in which we have addressed your requests for access or correction to your personal health information or if you have general concerns about our privacy practices, you may contact the Office of the Privacy Commissioner of Ontario at:

Information and Privacy Commissioner of Ontario

2 Bloor Street East

Suite 1400

Toronto, ON

M4W 1A8

Email: info@ipc.on.ca

Toll Free: 1-800-387-0073

TDD/TTY: 416-325-7539

Thank you for your support and understanding in helping our office comply with all regulatory requirements and generally with the law.