



Walsh & Associates Occupational Health and Safety Services, Ltd. Personal Health Information Protection Program Public Statement

Overview

This document provides an overview of the measures taken by Walsh & Associates to protect the personal health information it collects, uses and discloses. Taken together, these measures represent Walsh & Associates health information protection program. The program itself consists of ten interrelated privacy principles. Below is a statement on how Walsh & Associates fulfills the duties of each principle. In the province of Ontario, this program meets the legislated health privacy requirements of Schedule A of the Personal Health Information Protection Act (PHIPA).

Accountability

All Walsh & Associates employees who collect, use or disclose personal health information must meet the expectations of all ten principles described in this statement. These principles meet or exceed the requirements outlined in the Health Information Protection Act. To ensure their compliance with these principles, Walsh & Associates employees have been trained to understand and comply with them. Should you have any questions regarding any aspect of Walsh & Associates health information protection program, you should contact your local contact person, who's duty it is to answer those questions. The contact person has several other responsibilities, too. These are described later in this document.

Identifying Purposes

Whenever Walsh & Associates employees collect, use or disclose your personal health information, the reasons will be explained to you beforehand, except in medical emergencies. Walsh & Associates requires personal health information for a number of reasons. These include, but are not limited to, the provision of modified work, health benefits administration, and fulfilling obligations under other pieces of legislation, such as the Workplace Safety and Insurance Act, and the Occupational Health and Safety Act.

Consent

Walsh & Associates will only collect, use and disclose your personal health information in the ways for which you have given your consent. Where required by law, Walsh & Associates will always obtain your express consent prior to the collection, use or disclosure of your personal health information. At the same time, you must realize that failure to provide Walsh & Associates with the required consent may affect your access to health services and benefits. If you have questions about the consequences of refusing to consent, or the withdrawal of consent at a later date, contact your site contact person.

Limiting Collection

Walsh & Associates will collect only that personal health information relevant to purposes mentioned earlier ("Identifying Purposes") and for which you have consented ("Consent"). In many cases, the exact amount of personal health information needed in any circumstance is difficult to determine ahead of time. For this reason, Walsh & Associates relies on its medical staff (nurse, occupational rehabilitation nurses) and consultants (occupational physicians) to exercise professional judgement in the collection of personal health information.

Limiting Use, Disclosure and Retention

Walsh & Associates will only disclose your personal health information in the ways for which it has your consent, except where required by law. The exceptions will most likely involve the Workplace Safety and Insurance Act, which requires that Walsh & Associates notify the Workplace Safety and Insurance Board (WSIB) of all occupational illnesses and injuries.

Walsh & Associates will only keep your personal health information for as long as required to fulfill the purposes for which it was originally collected. In some cases, for example the surveillance programs run to comply with the Designated Substances regulations of the Occupational Health and Safety Act, the law determines the length of time health records are to be kept by a company. In most cases, however, no law exists and Walsh & Associates has developed retention policies based on the guidelines of professional medical groups, such as the College of Physicians and Surgeons of Ontario.

Accuracy

Walsh & Associates will take all reasonable precautions to ensure that the personal health information it collects, uses and discloses is as accurate as possible. Your personal health information's accuracy will be verified as circumstances require, for example at an appointment with Occupational Health Services. Should you feel that Walsh & Associates records are inaccurate, you have the right to have your file corrected. A professional opinion made in good faith will not be corrected. For more information, contact your site's contact person.

Safeguards

Walsh & Associates will take all reasonable precautions to protect the personal health information in its possession from unauthorized viewing, destruction or alteration. To this end, security practices protect both the storage and movement of paper and electronic health records. However, the details of a particular security technique may be withheld if releasing them publicly would compromise the technique. More information on these practices is available from your site's contact person.

Openness

More detailed information concerning Walsh & Associates personal health information protection program is available at your request. If you would like more information on the program, or the measures taken to protect your personal health information, please contact your site's contact person. We will try to answer all questions within thirty (30) days of submission.

Individual Access

You have the right to view the personal health information held by Walsh & Associates. Access requests must be submitted in writing to your site's contact person. In the vast majority of cases, you will be able to review your health information within thirty (30) days of submitting a formal request. You may also request copies of the personal health information captured by Walsh & Associates. This includes surveillance results, medical notes and injury reports. A set charge, established by Walsh & Associates, will apply for the copying of records. For more information, please contact your site's contact person.