

 <p data-bbox="310 163 570 226">FORT FRANCES PHYSICIANS GROUP</p>	<p data-bbox="824 128 1341 205">Confidentiality and Privacy Policy (Patients)</p>
<p data-bbox="196 226 521 260">Policy Updated: June 2025</p>	<p data-bbox="797 226 1208 260">Approved by: Director's Resolution</p>
<p data-bbox="196 260 542 291">Policy Number: 2025-06-002</p>	

1. Purpose

The Fort Frances Physicians Group (FFPG) understands that the protection of patients' Personal Health Information (PHI) is fundamental to providing the highest quality of care to our patients. The Fort Frances Physicians Group is classified as a Health Information Custodian (HIC) under the Personal Health Information Protection Act (PHIPA).

As a Health Information Custodian, the Fort Frances Physicians Group must take all reasonable steps to ensure all patient Personal Health Information is safely and appropriately collected, used, retained, disclosed and disposed of in accordance with the Personal Health Information Protection Act.

2. Personal Health Information (PHI)

Personal Health Information (PHI) means identifying information about an individual in either an oral or written form, including but not limited to, relating to their physical or mental health, medical history, providing and eligibility for healthcare.

3. Commitment

The Fort Frances Physicians Group ensures all FFPG workers are informed of their confidentiality and privacy obligations before any access of PHI is granted. Every worker of FFPG is required to sign the Confidentiality and Privacy Policy (Workers) when hired and on an annual basis thereafter. Every worker of FFPG will also be required to complete training relevant to Confidentiality and Privacy when hired and on an annual basis thereafter.

FFPG worker non-compliance to confidentiality and privacy may result in disciplinary action up to and including dismissal or termination and if applicable, reporting to legal or regulatory authorities.

4. PIPEDA – 10 Principles of Privacy

The following 10 principles form the basis for the collection, use, retainment, disclosure and disposal of PHI. These principles give individuals control over how the private sector is required to handle PHI information of others.

Principle 1: Accountability

FFPG workers are informed of the importance and requirement of safe-guarding PHI and are provided with instructions, training and awareness of disciplinary action if compliance is not met. In addition, FFPG has appointed the Business Manager as the Privacy Officer who enforces and ensures compliance with privacy matters through FFPG policies, staff training and government legislation.

Principle 2: Identifying Purposes

Personal Health Information is collected by the Fort Frances Physicians Group for the following, but not limited to, reasons:

- to treat and provide medical care
- to comply with legal and regulatory requirements
- to obtain payment for patient care and information

FFPG may collect PHI directly from the patient, from a person acting on behalf of the patient or from various Healthcare Practitioners/Facilities whom our patients have seen or visited. When PHI is provided

to FFPG, the assumption is that the patient has already given permission for the PHI to be released to us. Occasionally we may collect PHI about our patients from other sources as permitted by law.

Principle 3: Consent

In most cases, a patient's consent is implied based on an individual's action or inaction in certain circumstances, for example, booking an appointment with a Physician and therefore seeking their medical expertise and care. However, in some circumstances a patient's express, either verbal or written, consent may be required.

Principle 4: Limiting Collection

The Fort Frances Physicians Group will limit the PHI collected to that which is necessary for the purposes related to each patient's medical care.

Principle 5: Limiting Use, Disclosure and Retention

PHI will not be used or disclosed for purposes other than the specific requirements for a patient's medical care. FFPG will seek patient's written consent before using any PHI beyond the scope of its original purpose.

Principle 6: Accuracy

The Fort Frances Physicians Group works to ensure PHI is accurate, complete and up-to-date in order to properly satisfy the purposes for which it is to be used. While FFPG will strive to uphold accurate information, patients are asked to disclose all material information and inform us of any relevant changes.

Principle 7: Safeguards

The Fort Frances Physicians Group maintains PHI of patient's by physical (paper) and electronic files. FFPG safeguards PHI from unauthorized access, disclosure, use, modification, theft or loss regardless of the format in which it is stored. Safeguarding is completed by technical, administrative and physical means, in the following but not limited to, ways:

- FFPG worker training and agreement and acknowledgement to privacy policies and procedures
- hired contractors required to sign Privacy and Confidentiality Policy (Worker)
- physical records stored in "authorized access only" and lockable areas
- computers and Electronic Health Record (EHR) software are password-secured
- audits are completed at least quarterly by the Privacy Officer to monitor activity within the EHR software
- information no longer required is disposed of according to set procedures that govern the destruction of PHI.

Principle 8: Openness

The Fort Frances Physicians Group understands the importance of protecting patient's PHI and does not take the role of being a Health Information Custodian lightly. The hope is that this Confidentiality and Privacy Policy provides patient's with the information they need to ensure their confidence in us while we safely and appropriately collect, use, disclose, retain and dispose of patient PHI.

Principle 9: Individual Access

With limited exceptions, access to a patient's PHI retained by FFPG is granted upon presentation of a written request and satisfactory identification, within a reasonable amount of time. A fee for service may be charged to provide the patient with the PHI requested. If FFPG denies a patient's request to their PHI, the patient will be advised in writing as to why the request was denied. If a patient wishes to challenge this decision, they are able to do so (see Principle 10).

If a patient notices an error within their PHI, FFPG requests that we be notified as soon as possible to ensure the appropriate corrections are made. Please know, FFPG is not required to correct information related to clinical observations or opinions made in good faith.

Principle 10: Challenging Compliance

FFPG patient's are encouraged to contact us with any questions or concerns they might have about their privacy or our Policies. All patient inquiries surrounding privacy will be investigated and a response provided within a timely manner.

The Fort Frances Physicians Group believes that in most cases, any issues that may arise in regards to privacy can and will strive to be resolved simply through civil discussion.

Please reach us by phone or mail at the following:

*Business Manager
Fort Frances Physicians Group
301 Victoria Ave
Fort Frances, ON P9A 2C1
(807) 274-3287*

If a patient has a complaint and after contacting FFPG, feels their concerns have not been addressed to their satisfaction, FFPG will provide the patient with further complaint procedures at that time.

5. Conclusion

The Fort Frances Physicians Group will continue to take proactive steps in accordance with the Personal Health Information Protection Act (PHIPA) to ensure the safeguarding of all patients Personal Health Information (PHI).