SickKids® | Garry Hurvitz Centre for Community Mental Health

Tip sheet: Guide to Consent Directives and Audit Requests

Your privacy at GH-CCMH

The Garry Hurvitz Centre for Community Mental Health (GH-CCMH) is committed to protecting the privacy and confidentiality of your personal health information (PHI) and follow rules for how we use and share your information as set out in Ontario's Personal Health Information Protection Act (PHIPA). Understandably, health-care providers involved in your care need this information to care for you. This may include providers who do not work at GH-CCMH. For many reasons, you may want to keep parts of your health information private. In other words, you would only want certain providers within GH-CCMH to access your information or would not want GH-CCMH to share your information with external providers. In these cases, you would need to request that GH-CCMH limit our use and/or disclosure of your PHI through what is known as a Consent Directive or Lockbox Request. To request a Consent Directive/Lockbox on your health records, you must submit a formal written request. Please contact the Privacy Office to request this form (see page three for contact information).

This tip sheet explains:
- how we use and share your PHI;
- the ways you can limit who sees/receives your health information; and
- the potential unintended consequences of limiting the use/disclosure of your information.

What is my personal health information?

Personal health information includes any identifiable information about your health or health-care history. It includes things like your medical history, details of your visits with your provider, test results, and your health card number. This information is kept securely in our custody and forms your health record.

How is my information used and shared?

At GH-CCMH, only people who need your information to support your care are allowed to see it. This includes care team members directly involved in your care and those who need it for operational purposes like billing and risk management. We may also use your information to teach, conduct research approved by a Research Ethics Board and/or to improve the programs/services we provide.

GH-CCMH participates in, or may participate in the future, in provincially approved shared electronic health records and shared health record systems. These systems securely share electronic health information to provide timely and coordinated client care. Individuals accessing these systems are bound by user terms and can only access for approved purposes (e.g., health care). Examples include:
- *Ocean:* OceanMD is a Canadian health technology company that provides a digital client/patient engagement platform called Ocean. The platform is used by health-care providers to streamline patient intake, improve communication, and enhance workflow efficiency. OceanMD is widely used in Canada, particularly in primary care clinics, hospitals, and specialist practices.
- *Ontario Clinical Imaging Network* (OCINet): Ontario Hospitals and independent health facilities submit and access diagnostic images and results with OCINet. This protects patients because it avoids duplication of tests and may decrease the exposure of patients to radiation. Visit OCINet.
- *Ontario Laboratory Information Systems* (OLIS): OLIS allows hospitals and community laboratories to share laboratory, cytology and pathology test results. Visit eHealth Ontario - Lab results.
- *ConnectingOntario:* This is a provincial central repository that stores core elements of your health record at GH-CCMH that another care provider may access for continuity of care. Access is restricted to those who provide or assist with patient and client care. Visit eHealth Ontario - EHRs explained.

- *eCHN (electronic Child Health Network):* GH-CCMH is a member of eCHN (electronic Child Health Network) that allows other care providers, including community paediatricians, to have quick access to your child's health information from The Hospital for Sick Children (SickKids) and other hospitals such as laboratory results, doctor's notes, X-rays and visit information. Visit eCHN to learn more.
- *Integrated Assessment Record* (IAR): The IAR enables verified Health Service Providers to access client assessment information in a secure, accountable and timely way leading to more efficient care planning. Visit Ontario Health – IAR.
- Other people for whom you have given your consent, or when required by law.
- Other people working for a health agency, such as the Ministry of Health, if required by law.

Note: Access to the systems above (i.e., eCHN, Connecting Ontario, etc.) is strictly regulated and restricted.

We do not give information about you to your family or friends, your employer, your insurance company or others unless you agree, or the law permits it.

How much information do my health-care providers need to give me the best care?

We believe that to provide you with the best care, the people providing that care need to have access to all relevant information about your health.

Are there risks to limiting who can look at my health information?

If you limit those who can access your PHI:

- Your care provider, family doctor or other members of your care team may not have the information they need to give you the best possible care and may not be able to continue to care for you;
- It may be harder to find and send information in an urgent situation; and
- There is an increased risk of errors in your treatment or medications.

Please talk to a member of your care team about the possible risks of limiting access to your health information.

Are there any restrictions on these limits?

Under the law, GH-CCMH is allowed or obliged to use or disclose your information, even when you have not consented to it. Below provides examples of some circumstances where a Consent Directive/Lockbox cannot prevent your information from being used or disclosed.

- *As permitted by law*: For example, to make our health services better and more efficient through quality improvement processes.
- *As required by law:* For example, reporting the name of a patient or client being treated for a gunshot wound to the police, reporting certain diseases to Public Health, reporting suspected child abuse, or if GH-CCMH is served with a warrant or court order for the information.
- *To remove or reduce the risk of serious bodily harm:* For example, to prevent someone from driving while impaired.

How do I limit who can look at my personal health information?

We understand that in some cases, there may be information that you do not want to be used by GH-CCMH staff or shared with health-care providers outside GH-CCMH. For example, you may not want your family doctor to know about a particular treatment you have received. In these cases, you can complete the *Lockbox Request Form* to communicate your wishes to place limits on the use or sharing of some or all of your information. The *Lockbox Request Form* may be requested by contacting the CCMH Privacy Office or by speaking to a member of your care team. If you have placed

limits on your record but change your mind, please contact the Privacy Office.

What happens after GH-CCMH receives my Consent Directive request?

We will review to determine how we can accommodate your request. We can limit the use and disclosure of your information in different ways depending on what you request. In some cases, we may have to limit the use or disclosure of your full health record to limit access to the information that you want to keep private. We will contact you after reviewing your request to let you know how we can address it.

Can I request an audit of my personal health information?

You may request an audit detailing who accessed:

- Your information via the Centre's electronic health record at GH-CCMH; and/or
- Your information via the programs we use to share your personal health information (see "How is this information shared?" above).

What do I do if I have questions or concerns?

You can email the GH-CCMH Privacy Office at privacyofficer@sickkidscmh.ca.

If you wish to submit a formal request, please contact the Privacy Office to request the *Audit Request Form.* Please enter "Audit Request Form" in the subject line.

If you are unable to resolve a problem with the Privacy Office at GH-CCMH, you may contact the Office of the Information and Privacy Commissioner of Ontario at:

> 2 Bloor Street East, Suite 1400
> Toronto, ON M4W 1A8
> Telephone: 1-800-387-0073
> Website: www.ipc.on.ca
> Email: info@ipc.on.ca