

Doctors Nova Scotia Physician Support Program (PSP) Confidentiality Policy

Purpose

The Doctors Nova Scotia Physician Support Program (PSP) is a confidential service. The purpose of this policy is to guide the collection, use and potential disclosure of the personal health information of anyone accessing this service.

Protecting privacy and maintaining confidentiality is an integral part of the PSP. Nova Scotia's Personal Health Information Act (PHIA) and its regulations outline the PSP's duty as a custodian to protect the privacy of any personal health information collected, used and disclosed as a result of access to PSP services

What is personal health information?

Personal health information (PHI) is identifying information about an individual, and includes:

- Demographic information, such as name, date of birth, address, phone number and email address;
- Provincial health card number; and
- Physical and mental health care history.

PHI can be recorded or unrecorded, such as a printed lab result or a conversation about a wellness plan, and continues to be protected even after death.

What information is collected?

PSP clients may be asked to share a variety of PHI with PSP providers to allow for the provision of quality service. At a minimum, this will include your name and contact information. Any PHI collected by PSP is stored in a secure database and may only be accessed by the PSP coordinators and program administration.

What is the information used for?

Any of the information collected may be used by the PSP in one of the following ways:

- for audit and record-keeping purposes;
- to manage and develop the PSP;
- to learn about the needs of current and potential clients, to develop or offer services and product tailored to those needs and to communicate with those clients regarding current and future products and services; and
- to follow up on client comments and suggestions.

Otherwise, PSP will only disclose any PHI collected for the legitimate purposes identified in this policy and for which consent has been obtained, or if required or authorized by law. For example, we may disclose PHI information:

- In response to an order of the court;
- If the request for access to the PHI comes from an agency or individual expressly entitled by legislation to a copy of the records such as the *Workers Compensation Act*;
- To the appropriate regulatory body in the event that an individual continues to provide clinical services while chemically or medically compromised; and
- Where PSP counsellors are legally required to report by a statute such as the *NS Children and Family Services Act* and the *Adult Protection Act*.

PSP services are not billed through MSI and any PHI collected as a result of this service will not be made available to MSI.

How long do you retain my information?

For adults, PHI will be retained for 10 years past the last entry. For clients under the age of majority (19), PHI will be retained for 10 years from the time the minor reaches the age of majority.

Upon expiration of the retention period, the PHI will be permanently destroyed or de-identified.

How do we protect your information?

DNS uses appropriate security measures to protect against loss, theft, unauthorized access, disclosure, use or modification of PHI. Such measures will involve, as applicable, physical, organizational and electronic security measures, including premises security, restricted file access, technological safeguards including security software and firewalls to prevent unauthorized computer access, and password and security policies.

As e-mail is not a fully secure medium, PSP cannot guarantee the security of PHI communicated by the client in this manner.

Updating your information and correcting errors

As PHI may be relied upon to provide quality services, it is important that the information be accurate and up-to-date.

If there is any change to the PHI, making it inaccurate or incomplete, it is the client's responsibility to advise the PSP providers to allow for prompt correction of the PHI.

Access to your personal information

The PSP will respond promptly to any client's request for access to their PHI. There will be no cost for reasonable requests to such access, unless the request involves copying of records other significant retrieval costs. PSP will advise provide an estimate of the cost, if any, prior to the retrieval of such records or information. PSP is not required to respond to requests for access to personal health information that are frivolous, vexatious or repetitious.

Changes to the policy

Revisions to this policy will be posted to the DNS PSP webpage

Contacting PSP

Any questions or concerns about this policy should be directed to the attending of Nancy Milford, DNS Privacy Officer, 25 Spectacle Lake Drive, Dartmouth, NS B3B 1X7 (p) 902-481-4921 (e) nancy.milford@doctorsns.com.