



**Occupational Health  
Clinics for Ontario  
Workers Inc.**

**Centres de santé  
des travailleurs (ses)  
de l'Ontario Inc.**

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**Occupational Health Clinics for Ontario Workers Inc.  
Collection, Use and Disclosure of Personal Health Information Policy  
November 27, 2015**

The Occupational Health Clinics for Ontario Workers Inc. (OHCOW) collects personal health information about workers directly from the worker and/or, where applicable, from the person acting on the worker's behalf.

The personal health information that OHCOW collects includes, but is not limited to, the worker's name, date of birth, home and email address, health history, OHIP number, SIN and the records of visits to health care professionals along with treatments and care provided.

Occasionally, OHCOW collects personal health information about workers from other sources if it has obtained the worker's consent to do so or if the law permits.

**Uses and Disclosures of Personal Health information**

OHCOW may collect, use and disclose the personal health information of a worker in the following contexts and/or for the following purposes:

- To plan, administer and manage OHCOW's internal operations;
- To share personal health information with personnel at other OHCOW locations where doing so is consistent with the other purposes set out herein;
- To conduct risk management and quality improvement activities (such as sending patient/client satisfaction surveys);
- To teach (omitting any personal identifying information);
- To compile statistics, analyze trends and manage OHCOW's database (omitting any personal identifying information);
- To participate in particular research initiatives OHCOW believes will benefit its clients. Consents for each individual research project are obtained separately.
- To provide medical reports and/or assessments to the Workplace Safety and Insurance Board (WSIB), including the Operations Branch and/or Appeals Branch and the Workplace Safety & Insurance Appeals Tribunal, which include personal identifying information. These reports may be relied upon in the context of the worker's WSIB claim and may assist the adjudicator(s) to determine entitlement.

Be advised that:

- While OHCOW endeavours to allow workers and/or their representatives to review a given report before it is forwarded to the WSIB, in certain circumstances, a report and/or assessment OHCOW prepares may be

- disclosed to the WSIB without the worker's or worker's representative's advance review.
- Workers should understand that in certain circumstances, OHCOW may provide information to the WSIB regarding a worker regardless of the worker's consent.
  - To submit reports to the WSIB and/or the Ministry of Labour (MOL) regarding OHCOW's operations. These reports are necessary for the funding arrangements with the WSIB and/or MOL. Personal identifying information of workers is not included in these reports; and
  - To comply with legal and regulatory requirements and fulfill other purposes permitted or required by law.
    - This includes producing and disclosing personal health information where required to do so, for example, by order or summons of a competent tribunal, including but not limited to the WSIB and its various branches.
  - To give effect to any instructions, requests and further consents OHCOW receives from the workers to whom it provides services.
  - If there is a reasonable basis to believe that disclosing a worker's personal health information is necessary to avoid harm to a person, OHCOW may disclose a worker's personal health information, but will strive to do so only to the extent required in order to address the risk of harm.

### **Workers' rights**

- OHCOW takes steps to protect personal health information from theft, loss and unauthorized access, copying, modification, use, disclosure and disposal.
- OHCOW conducts audits and completes investigations to monitor and manage our privacy compliance. OHCOW ensures that every person who performs services for OHCOW protects privacy and only uses workers' personal health information for the purposes for which OHCOW has the worker's consent.
- OHCOW's clients may refuse to give consent and have the right to withdraw consent at any time. This includes the right to give or withdraw consent in part or to limit the collection, disclosure and/or use of their personal health information to certain purposes where possible. In such circumstances, OHCOW's ability to provide services may be limited or extinguished.
- OHCOW's clients have the right to complain to the Information and Privacy Commissioner/Ontario at any time. The Commissioner can be reached at:
  - Information & Privacy Commissioner/Ontario
  - 2 Bloor Street East, Suite 1400
  - Toronto, ON M4W 1A8
  - Ph: 1-800-387-0073 Fax: 1-416-325-9195

### **How to Contact Us**

For more information about our privacy protection practices, or to raise a concern, contact us at:

Dave Wilken, Privacy Officer  
1090 Don Mills Road, Suite 606  
Toronto, ON, M3C 3R6 [dwilken@ohcow.on.ca](mailto:dwilken@ohcow.on.ca)  
Ph: 416-510-8713 Fax: 416-443-9132 [www.ohcow.on.ca](http://www.ohcow.on.ca)