



Information and Privacy  
Commissioner of Ontario  
Commissaire à l'information  
et à la protection de la vie privée de l'Ontario

Jan 23, 2017

The College of Physicians and Surgeons of Ontario  
80 College Street  
Toronto, ON  
M5G 2E2  
Attention: Policy Department

To Whom It May Concern:

**Re: Ending the Physician-Patient Relationship**

Thank you for inviting the Information and Privacy Commissioner of Ontario (IPC) to comment on the College of Physicians and Surgeons' ("College") *Ending the Physician-Patient Relationship Policy* ("Policy"). It is our understanding that the Policy sets out the College's expectations for physicians who end the physician-patient relationship for any reason other than the physician's retirement, relocation or leave of absence, or as a result of disciplinary action by the College.

On the third page of the Policy, at lines 65-67, it states "when a physician believes that the patient poses a genuine risk of harm to themselves, their staff, colleagues, or other patients, the physician has no obligation to interact with that patient prior to discontinuing the relationship." In our view, the reference to "themselves" may be ambiguous in this context. The IPC recommends that this sentence be reworded to clarify that the risk of harm is to the physician rather than the patient. For example, the sentence could state, "when a physician believes that the patient poses a genuine risk of harm *to the physician...*"

The Policy outlines a number of actions that are expected to be taken by the physician when ending the physician-patient relationship for the reasons permitted. On page 8 of the Policy, at line 189, it states "Notify appropriate staff (e.g., office receptionist) that care is no longer being provided to the patient." The IPC recommends that this expected action be clarified to state that such notification should only be provided when the patient has not withheld or withdrawn consent to the collection, use or disclosure of their personal health information by the member of the physician's staff to whom the notification would otherwise be provided.

Thank you once again for providing the IPC with the opportunity to participate in this consultation process. I hope these comments will be of assistance to the College in reviewing the Policy.

If you have any questions about our comments, please do not hesitate to contact me.



2 Bloor Street East  
Suite 1400  
Toronto, Ontario  
Canada M4W 1A8

2, rue Bloor Est  
Bureau 1400  
Toronto (Ontario)  
Canada M4W 1A8

Tel: 416-326-3333  
1-800-387-0073  
Fax/Téléc: 416-325-9195  
TTY: 416-325-7539  
[www.ipc.on.ca](http://www.ipc.on.ca)