



Privacy Statements in Plain Language

In Search of Plain Language

I spent a lot of years in school and assumed that multi-syllable words would earn extra marks. Now I spend a lot of time trying to use 'plain language' so that it is easier for people to read and understand what I write.

In a recent article from IAPP (International Association of Privacy Professionals), "Privacy Policies: How To Communicate Effectively with Consumers" the authors discuss the regulatory and judicial consequences to your business of failing to make sufficiently clear, accurate, and comprehensible privacy disclosures for on-line consents. They also provide some great resources on how to improve your plain language skills.

Primary care practice managers and clinic managers are required by legislation and regulated professions standards to develop forms and notices to inform their patients and clients of what to expect at the clinic. These documents usually have one of two main purposes:

- inform our patients and client about how their information is being collected, what will be done with it and what their choices are.
- inform our patients and clients about their care and treatment.

Each purpose is important – important enough for us to take the time and effort to make the documents easy to read and easy to understand. Let's create a Privacy Statement poster that you can use and adapt for your practice. First, we need some guidelines about plain language.

What is plain language?

The objective of plain language is to write in simple conversational English at about an eighth grade reading level. Here are some basic plain language guidelines that make documents easy to understand. (A full discussion of tips for writing a plain language privacy policy can be found in Kinsella Media's Plain Language Primer for Privacy Policies.)

- Omit legal/technical jargon and limit defined terms,
- Use positive language,
- Avoid double negatives,
- Use active voice,
- Pare down sentences to one thought,
- Omit wordy phrases (instead of "in order to" use "to")
- Use personal pronouns,
- Keep the message personal by using question and answer format to explain common situations
- Describe complex issues in "if this, then that" terms. For example; "If you have a question or complaint, then contact us here."

Design the poster using a reader friendly format much like an advertisement.

- Use simple, descriptive headers,
- Fonts need to be large enough so the average person can easily read the notice. Twelve points or bigger using fonts like Verdana or Arial improves readability,
- Emphasize key points by using bullets, underlining and/or italics,
- Never use all CAPITAL LETTERS,
- Use highlighting in moderation,
- Use examples to describe practices or put the content into an easy-to-read chart

Content in a Privacy Statement

List the objectives or main points of your statement. For example,

- Your mission statement or goal. This is the opening or introduction of the privacy statement. Explain why this statement is important to the patient.
- What types of personal information we collect about you,
- How we use your personal information,
- With whom we share your personal information,
- To whom is your personal information disclosed,
- How we protect your personal information,
- Who you can contact if you have a complaint or want more information

Privacy Statement Poster Sample #1

Our Clinic respects the privacy rights of our patients and employees and is committed to protecting the personal information that we collect from you. We have adopted this Privacy Statement to guide how we collect, use and disclose the information you provide to us.

We will:

- ✓ only collect information required for your care and treatment

- ✓ give you access to your own records and, if requested, make copies of them at a reasonable cost
- ✓ only share your information with other health providers that they need to provide you with proper health care
- ✓ ask your permission to share your health information if required for other purposes unless I must provide it for legal reasons
- ✓ keep your information safe
- ✓ keep accurate records.

In the event our Clinic changes ownership or is closed, we will try to contact you. We will tell you how you can get a copy of your information. If you ask us, we will transfer your information to another health provider.

For more information, please talk to the Clinic Manager or Privacy Officer.

Privacy Statement Poster Sample #2

Our Clinic believes that the personal information that you provide to us is sensitive and important to you. We will follow these principles to maintain the confidentiality and security of your information.

Principle 1 -We are accountable for the personal information that you give to us.

Principle 2 -Our Clinic will tell you why we collect your personal information, before the information is collected.

Principle 3 - Our Clinic will collect, use and may disclose personal information about you. You may withdraw consent at any time.

Principle 4 - Our Clinic will ask you for your personal information only when we need it to do our job to help you.

Principle 5 - Our Clinic will use or disclose your personal information only for the reasons that you provided it to us.

For more information, please talk to the Clinic Manager or Privacy Officer.

Privacy Statement Poster Sample #3

Our Promise to You

To help you, the Clinic needs to get information about you. We will share your information only with those people you agree to.

We promise to:

- ✓ get only the information needed
- ✓ keep your information safe
- ✓ keep careful records
- ✓ ask for your “okay” to share your information
- ✓ let you read your own file and, if asked, make copies of them at a fair cost
- ✓ only share your information with other people who are directly involved in your care and treatment

For more information, please talk to the Clinic Manager or Privacy Officer.

Using the Privacy Statement

The Privacy Statement should be made available to the patients in a way that would be reasonable to expect that the patient has an opportunity to read and understand or ask questions about the statement. You could

- frame the poster and hang it in the waiting room or examination rooms,
- insert the poster into closed circuit TV monitors in the waiting room,
- display the message into computer screen savers,
- laminate the poster and use it as a cover page on the clipboard given to the patient when they are asked to complete forms at the clinic

Use more than one method to share the Privacy Statement. This is a good strategy to ensure that each patient has the opportunity to read the poster on their first and subsequent visits to the clinic.

Conclusion

Revising your privacy statement into plain language helps the clinic review your own practices and often provides clarity and improvements. An easily understood privacy statement helps to meet regulations and standards compliance of the clinic. Perhaps most importantly, when the patient understands the privacy statement, the patient becomes actively involved in the process of collection, use, and disclosure of their personal information. Using plain language may not be simple but it can help you improve your practice management.

What is the next notice, form, policy, or procedure in your practice that can benefit from a plain language revision?

Send Jean your examples of plain language privacy statements. We will post a follow-up article with your comments and examples.

Other Similar Information Managers Resources

[Tax Poster, Consent Disclosure for Tax Purposes](#)

[Pro-active Privacy](#)

Bibliography / Resources

Kinsella Media, LLC. "Plain Language Primer for Privacy Policies", <http://www.kinsellamedia.com>. February 2014.

Wheatman, Shannon and Michelle Ghiselli. "Privacy Policies: How To Communicate Effectively with Consumers", https://www.privacyassociation.org/media/pdf/knowledge_center/IAPP_KMPrivacyPaper_FINAL.pdf. February 2014.

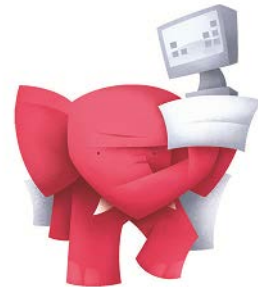
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It's the elephant in the room: your practice depends on your record management, and the privacy and protection of all kinds of confidential information.

But sometimes taking care of this elephant can be a challenge.

We're here to help. Information Managers specializes in health information management, policies and procedures, records management, clinic management, practice efficiency and workflow consultation as well as privacy and security in the Health Care sector. We give you the confidence to take care of the elephant in the room.



We work with office managers, primary care facilities, health service providers and vendors. We ensure that your office practices not only meet legal requirements, but are streamlined and efficient, making sure that all parties involved feel secure about their personal information.