

## **Privacy Policy**

The information provided below summarizes how your personal information will be protected. This document was developed in accordance with the Personal Health Information Protection Act (PHIPA).

We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services I provide. We try to be open and transparent as to how I handle personal information. Following is a description of our privacy policy.

### **What is personal information?**

Personal information is information about an identifiable individual. Personal information includes information that relates to: an individual's personal characteristics (e.g. gender, age, income, contact information, ethnicity, family status, education, profession, payment information); health (e.g. health history, health conditions, health care providers, insurer provider details); or activities and beliefs (e.g. religion, politics, opinions).

### **Purposes of collecting personal information:**

#### **Primary Purposes:**

The collection, use and disclosure of personal information is to serve our clients. Our primary purpose for collecting personal information is to provide psychotherapy treatment. We may collect information about a client's personal characteristics, health or activities and beliefs in order to help us assess what their counselling needs are, to advise them of their options and then to provide the counselling mutually agreed upon. Additionally, personal information may be used in the participation of supervision activities (registered psychologist, peer, group).

The disclosure of personal information requires a client's express (oral or written) consent. In the event of extraordinary circumstances (e.g. client health emergency and legal requirements) a client's express consent may not be required for disclosure

#### **Secondary Purposes:**

As psychotherapists, we collect, use and disclose information for purposes that are related, but are secondary, to our primary purposes. The secondary purposes include:

- Complying with regulations of the College of Psychotherapists of Ontario who may inspect my records and processes as part of their regulatory activities in the public interest.
- Addressing reported cases of serious misconduct, incompetence or incapacity of other practitioners by notifying the appropriate regulatory body.
- Reporting information for which we am ethically and legally required.
- Responding to the requirements of government agencies (e.g. Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) who have the authority to review our records as a part of their mandates. In these circumstances, we may consult with professionals (e.g. lawyers, accountants) who will advise us in situations of conflicting rights and obligations.
- Communicating with third-parties who pay for some services (e.g. private insurance companies).
- Invoicing clients for services that were not paid for at the time, or to collect an unpaid account

In the situations listed above, express consent for disclosure of personal information is not required under PHIPA.

### **Protecting Personal Information**

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- Paper information is secured in a locked or restricted area.
- Electronic devices are secured in a locked or restricted area. Devices are password protected.
- Paper information is transmitted through sealed addressed envelopes.

### **Retention and Destruction of Personal Information**

Personal information is retained by law for a minimum of ten years after the last contact for adults and, for child clients, 10 years past the date at which they would turn 18 years of age.

Following this period, paper files are shredded and any electronic information is deleted.

### **Access to Your Personal Information**

You have the right to seek access to your health records that we keep and to ask us to correct a record if you believe it is inaccurate or incomplete. Please contact us for more information.

## **Do You Have a Question?**

If you have any objections to our privacy practices, we welcome you to share that with us. You also have the right to share your objections with the Information and Privacy Commissioner of Ontario:

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

1-800-387-0073  
Fax 416-325-9195  
[www.ipc.on.ca](http://www.ipc.on.ca)