

PRIVACY POLICY

What is Personal Health Information? The practice of psychology in Ontario is regulated under the provincial Regulated Health Professions Act (RHPA). As such, all identifiable information collected by a psychologist about an individual in the course of practicing psychology is considered "personal health information" under the Personal Health Information Protection Act (PHIPA, 2004). This includes your name and contact information, as well as any information collected and/or recorded in the course of providing services to you.

Collection of Your Personal Health Information: We collect your personal health information only directly from you, except: (a) when you have provided consent to obtain such information from others (e.g., reports of previous assessments or of other services); and (b) when the law requires or allows me to collect information without your consent (e.g., urgent situations, when information is needed to prevent potential harm).

We collect only information from you that we believe is needed: (a) to provide you with the psychological services you have requested; (b) to maintain contact with you for service-related purposes; and (c) to prevent harm (e.g., emergency contact). Information collected from you for any other purpose (e.g., research) will first require your informed consent. If you decide that you do not want to provide this latter type of information, you are completely free to refuse. There will be no impact on your services.

By law and in accordance with my professional standards, we are required to keep a record of my services to and contacts with you. Your record includes information you provide to me or authorize me to receive, results of any assessments, consent forms, session notes, billing information, contact logs, and correspondence that we have sent or received related to your service. The physical records are the property of the practice. However, you have rights regarding access to your record and disclosure of information from your record (see below), regardless of the form in which the information is recorded. In this office, information is recorded in both written and electronic form.

Use of Your Personal Health Information: At the Centre for Change, the primary use of your personal health information is to provide psychological and/or counselling services to you. This includes carrying out all of the functions reasonably necessary to provide those services (e.g., service planning and monitoring, record maintenance, billing).

Paper and electronic information are secured in a locked or restricted area at all times, and passwords are used on computers. Paper information is transmitted through sealed, addressed envelopes that have been stamped "Confidential." Electronic information is transmitted through non-encrypted emails with your consent. Faxing is used to transmit or receive confidential client information only when necessary.

The College of Psychologists of Ontario, the organization that regulates psychologists in Ontario in the public interest, may at times access and inspect client records as part of an external audit. However, we do not allow removal of any identifiable client information from these premises for these purposes. Moreover, all professional persons involved in these activities are required by law to maintain confidentiality of any accessed information.

Disclosure of Your Personal Health Information: With only a few exceptions, your personal health information will not be disclosed to persons outside this practice without your knowledge and expressed, written consent. The exceptions are: (a) when allowed by law (e.g., clear and imminent risk of serious bodily harm to someone; professional or legal consultation); and (b) when required by law (e.g., mandatory reporting of a child who might be in need of protection; mandatory reporting of a regulated health professional who has sexually abused a client; a court order to release information from a record). These exceptions are known as "limits of confidentiality." If there are other limits of confidentiality specific to your situation, your therapist will identify and discuss them with you before proceeding with your service.

Please note that the law requires any disclosure of your personal health information to be limited to information that is reasonably necessary for the purpose of the disclosure and not to include private information provided by a third party. Professional ethical standards additionally require that any information that might cause serious harm to someone not be disclosed, unless required by law.

When consenting to the disclosure of your personal health information, you may restrict me from sharing all or any part of your information. However, if in your therapist's opinion the information is reasonably necessary for another health service

provider to provide appropriate services, we are required by law to inform the other provider that you have refused consent to provide some needed information.

Right of Access to Your Personal Health Information: With only a few exceptions, you have the right to access any record of your personal health information and to request copies of the information (we reserve the right to charge a nominal fee for record copying). If the physical record contains personal health information about another individual, that individual's information must be severed from the record before you may access the record. Other exceptions include access to raw data from psychological assessments, information provided in confidence by a third party, and information that could result in serious harm to someone's treatment or recovery, or in serious bodily harm to someone.

If you believe that information in your record is not accurate, you have the right to request a correction. This applies to factual information and not to the professional opinion of your therapist. Your request to correct the record must be written and will require 30 days to review your request. Where we agree there is an error, your therapist will make the necessary correction and notify all persons to whom the information may have been sent. If there is not an agreement to correct the record as requested, you may file a notice of disagreement into your record and your therapist will forward that notice to all persons to whom the information has been sent.

Retention and Destruction of Personal Health Information: We must retain personal health information for some time to ensure that we can answer any questions you might have about the services provided and for my own accountability to external regulatory bodies. The College of Psychologists of Ontario requires that client records be kept for at least 10 years past the date of last contact for adults, and 10 years past the date at which the client would turn 18 years of age. We destroy paper records containing personal information through shredding, we remove electronic information through deletion, and we physically destroy the hard drive of discarded hardware.

Do you have a Question or Concern? These privacy policies and procedures have been developed in accordance with the laws of Ontario, as well as professional regulations and ethical standards. Further details of the applicable laws, regulations, and ethical standards may be found at the websites of the Ontario Ministry of Health and Long Term Care (www.health.gov.on.ca), the College of Psychologists of Ontario (www.cpo.on.ca), and the Canadian Psychological Association (www.cpa.ca).

We will speak to you directly to answer any questions you might have regarding this Privacy Statement. If you would like more detailed information at any time, would like to access or ask for a correction of your record, have a concern about my privacy policies and procedures, or have a complaint about the way your privacy has been handled, please do not hesitate to speak or write to your therapist or psychologist.

General inquiries or Complaints may also be addressed to:

The Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto, Ontario M4W 1A8
Phone: (416) 326-3333, (800) 387-0073, TTY: (416) 325-7539, Fax: (416) 325-9195
Website: <http://www.ipc.on.ca/>

If you have concerns about the professionalism or competence of our services, we would be pleased to discuss those concerns with you. If we cannot satisfy your concerns, you are entitled to complain to our provincial regulatory body:

The College of Psychologists of Ontario
110 Eglinton Avenue West, Suite 500
Toronto, Ontario M4R 1A3
Phone: (416) 961-8817, (800) 489-8388, Fax: (416) 961-2635
E-mail: cpo@cpo.on.ca