

CENTRETOWN PSYCHOLOGICAL SERVICES

PRIVACY POLICY

Centretown Psychological Services (CPS) is comprised of a group of psychologists and one part-time support staff who offer psychological assessment and treatment to the general public. Our policies with regards to protecting confidential information are governed by the College of Psychologists of Ontario (CPO), and the provincial legislation of the Regulated Health Professions' Act (RHPA) and the Personal Health Information Protection Act (PHIPA). Privacy of personal information is an important value of Centretown Psychological Services, and the development of this document describes our privacy policies.

WHAT IS PERSONAL INFORMATION?

Personal information is any identifying information about an individual that relates to personal characteristics such as age, home address, phone numbers, family and marital status, as well as information relevant to the client's health and presenting concerns. All of these types of information are protected by privacy legislation. Collection of personal health information requires consent that is implied by the fact that the individual is giving the information. Health information is entrusted to the care of a health information custodian, i.e., the psychologist with whom you work. Information is not released to third parties (e.g., an insurance company) without a client's informed consent.

Information can be shared with other health professionals who are involved in your care without written consent, but written consent is required if information is to be sent to any other third party. Individuals may expressly instruct that their personal health information not be used or disclosed for the purpose of health care. If this is the case, then individuals must specify exactly what is not to be disclosed and the recipient must be informed that part of the health record is being withheld.

PERSONAL INFORMATION: PRIMARY PURPOSES

The main reason for collecting personal information (e.g., date of birth, address) is for accurate identification. Another purpose is to facilitate valid psychological assessment and treatment. For example, we collect relevant information about a client's personal history to help us assess what his/her needs are, and to provide related treatment. Another primary purpose is to obtain initial baseline information to monitor progress or change over time.

PERSONAL INFORMATION: SECONDARY PURPOSES

Under very specific circumstances, relevant identifying information may be disclosed for purposes that are secondary to the primary purposes stated above. The most common examples of information used for secondary purposes are as follows:

- to invoice clients for services that were not paid at the time, to process credit-card payments, to collect unpaid accounts, or to send receipts.
- the cost of some services to clients is paid for by third parties (e.g., private insurance, WSIB). These third party payers must have your informed consent for us to disclose to them any information to demonstrate your entitlement to this funding.
- psychologists are also regulated by the College of Psychologists of Ontario who, for quality assurance purposes, may inspect our records and interview us as part of their regulatory activities acting in the public interest. In addition, psychologists are obliged to report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own.
- also, various government agencies (e.g., Canada Customs and Review Agency, the Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as part of a criminal investigation. In these rare circumstances, we would consult with professionals (e.g., lawyers, accountants) to ensure that these requests are legitimate and required by law.

PROTECTING PERSONAL INFORMATION

To protect personal information, we have adopted the following procedures:

- paper information is secured in a locked or restricted area.
- electronic hardware is either under supervision or secured at all times. Passwords are used on all computers.
- paper information is transmitted through sealed, addressed envelopes or boxes, and delivered by reputable organizations. Paper files containing personal information are destroyed by shredding.
- electronic information is transmitted either through direct-line or is encrypted. Electronic information is destroyed by deleting.
- staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.

RETENTION OF PERSONAL INFORMATION

Psychologists retain client information in a secure location for a period of at least 10 years after the termination of treatment, as required by the College of Psychologists.

ACCESS TO INFORMATION

Clients have the right to see the personal information contained in their file. We will try to help you understand any information you do not understand (e.g., notes, technical language, etc.). We reserve the right to charge a reasonable fee for such requests. We may ask that you put your request to see your file in writing. If you believe that there is a mistake in the information, you have the right to ask that it be corrected. This request applies to factual information and not to any professional opinions that were formed.

We may ask you to provide documentation supporting your request to make corrections to your file. Where we agree that a mistake was made, the correction will be made and we will notify anyone to whom this information was sent. If we do not agree that a mistake was made, we still agree to include in our file a brief statement from you on this point and we will forward this statement to anyone else who received the earlier information.

IF YOU HAVE A QUESTION

Please contact your psychologist about any questions or concerns that you may have. If you wish to make a formal complaint about the privacy practices, you may make it in writing to your psychologist. Your psychologist will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal decision and rationale in writing.

This policy is made under the Professional Information Protection and Electronic Documents Act (PIPEDA) and the Personal Health Information Protection Act (PHIPA). There are some additional exceptions to the privacy principles that are too detailed to set out here as well as some rare exceptions to the commitments set out above.

For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner can also act as an ombudsman for privacy disputes. The Federal Information and Privacy Commissioner can be reached at:

112 Kent Street, Ottawa, Ontario
Phone (613) 995-8210 ; Toll Free 1-800-282-1376
Fax (613) 947-6850 TTY (613) 992-9190
www.privcom.gc.ca

For health information-related concerns, the Information and Privacy Commissioner of Ontario can be reached at:

80 Bloor Street West, Suite 1700
Toronto, Ontario
Phone (416) 326-3333
Web: www.ipc.on.ca
E-mail: commissioner@ipc.on.ca