



## Privacy Policy

The privacy of personal information is an important principle to us. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. We strive to be open and transparent about how we handle personal information. This document describes our privacy policies.

### What is Personal Information?

Personal information consists of information relating to an identifiable individual. Personal information includes information that relates to an individual's *personal characteristics* (e.g., gender, age, income, home address or phone number, ethnic background, family status); *health* (e.g., health history, health conditions, health services received by them); or, *activities and opinions* (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is different from business information (e.g., an individual's business address and telephone number). Business information is not protected by privacy legislation.

### Collection of personal health information

#### Primary purposes

##### **About our clients**

We collect, use and disclose personal information to serve our clients. We collect information such as the client's health history including personal and family history, physical condition and functioning, as well as social, personal and work/school situations. The primary purpose for collecting personal information about our clients is to enable the psychologist or clinician to make established clinical decisions regarding evaluations and/or treatments. A second primary goal may include monitoring symptoms and/or distress levels over time to examine changes in psychological functioning during the course of treatment.

We collect your personal health information directly from you, except a) when you have provided consent to obtain such information from others (e.g., reports of previous assessments or other services); and b) where the law requires or allows us to collect information without your consent (e.g., in an urgent situation, when information is needed to prevent potential harm).

We only collect information from you that we trust is reasonably necessary to provide you with services. If we collect information from you for any other purpose (e.g., research), it will be done only with your acknowledgment and consent. If you decide that you do not wish to provide additional information that is not necessary for your service, you can refuse to do so with no impact on the services that you receive.

## **About Members of the General Public**

For members of the general public, our primary purposes for collecting personal information are to provide notice of special events (e.g., a seminar or conference) or to make them aware of OPHT services. For example, while we try to use workplace contact information where possible, we might collect home addresses, fax numbers and email addresses. We try to obtain consent before using any such personal information, but where this is not, for any reason, possible, we will upon request immediately remove any personal information from our distribution list.

On our website, we only collect, with the exception of cookies, the personal information you provide and only use that information for the purpose you gave it to us (e.g., to respond to your email message, to sign-up for a workshop, to subscribe to our newsletter and to be registered on our waiting list). Cookies are only used to help you navigate our website and are not used to monitor you.

## **About Contract Staff, Volunteers and Students**

For people who are contracted to do work for us (e.g., temporary workers), our primary purpose for collecting personal information is to ensure that we can contact them in the future (e.g., for new assignments) and for necessary work-related communication (e.g., sending out paycheques and year-end tax receipts). Examples of the type of personal information we collect for those purposes include home addresses and telephone numbers. If contract staff, volunteers or students wish a letter of reference or an evaluation, we will collect information about their work-related performance and provide a report as authorized by them.

## **Related and Secondary Purposes**

Like most organizations, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

- To invoice clients for services that were not paid for at the time or to collect unpaid accounts.
- To advise clients and others of special events or opportunities (e.g., a workshop, or development of a new service) that we have available.
- Psychologists in autonomous or supervised practices as well as psychotherapists are regulated by the College of Psychologists of Ontario and the College of Registered Psychotherapists of Ontario. These colleges may inspect some records and interview staff as part of their regulatory activities to work in the public interest. The College of Psychologists of Ontario and the College of Registered Psychotherapists of Ontario have its own strict privacy obligations.
- The costs of the services (or a portion of the services) provided to our clients are sometimes paid by third parties (e.g., WSIB, MVA insurers, lawyers, private rehabilitation companies). These third-party payers often have the client's consent or legislative authority to direct us to disclose to them certain information to demonstrate the client's entitlement to this funding.

## Protecting Personal Information

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

- Paper information is either under supervision or secured in a locked and restricted area.
- Electronic hardware is either under supervision or always secured in a locked and restricted area. In addition, passwords are used on computers.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through internal messaging on the customer's portal (via the customer portal on the Owl Practice platform), via our encrypted web messaging service (Hushmail), or has identifiers removed and is encrypted.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfil their duties and in accordance with our privacy policy.
- External consultants and agencies with access to personal information must enter into privacy agreements with us.

All staff members are allowed to have access to information about you only on a "need-to-know" basis. A staff person who knows you personally is required to inform us of that relationship and is not allowed to have access to your record unless there is an emergency, or you give consent.

Your record occasionally may be accessed for licensing, or accreditation purposes (e.g., College of Psychologists). However, we will not allow any information that identifies you to be taken from our premises for these purposes. All people involved in such activities are required by law to maintain the confidentiality of any accessed information.

## Limits to the Protection of Private Information

Limits to the protection of private information include:

1. Legally mandated disclosure to Children's Aid Society (Ontario), to Valoris (Ontario), or the Direction de la protection de la Jeunesse (Québec); Mandatory reporting of a health professional who abuses his patients or clients to its College, and legally mandated reporting to the Director of the Ministry of Health and Long-term care or to the Retirement Homes Regulatory Authority.
2. Information disclosure mandates required by the College of Psychologists of Ontario, by the College of Registered Psychotherapists of Ontario or by Court orders to release information, search warrants for a file in a criminal or a legal case, and subpoenas.

When consenting to the disclosure of your personal health information, you may restrict us from sharing all or any part of your personal information. However, if, in our opinion, the information is reasonably necessary for another health service provider to provide appropriate service, we are required by law to inform the other provider that you have refused consent to provide certain essential information.

Although the law allows access to personally identifiable health information for research purposes under strict conditions, it is our policy not to allow external researchers access to information that can be identified as belonging to you, unless you consent to such access.

### **Your Right of Access to your Personal Health Information Record**

With only a few exceptions, you have the right to access any record of your personal health information, and to request copies of that information. If you believe that the information in your record is not accurate, you may make a written request to correct your record. If we do not agree with the correction you request, you may file a notice of disagreement in your record.

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

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our accountability to external regulatory bodies. To protect your privacy, we do not keep personal information longer than recommended by the College of Psychologists of Ontario and the College of Registered Psychotherapists of Ontario. We keep our client files for 10 years. If a recipient of our psychological services was younger than 18 years of age, we retain the files for 10 years past the former client's 18<sup>th</sup> birthday. We destroy paper files containing personal information by shredding it. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed.

### **Do You Have a Concern?**

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

Orleans Psychological Health Team  
Health Information custodian  
Ms. Sylvie Renaud, Office Manager  
2555 St-Joseph, Suite 202  
Orleans, Ontario, K1C 1S6  
Tel: 613.454.7770 | Fax: 613.454.7771  
[www.espo-opht.ca](http://www.espo-opht.ca)

If we cannot satisfy your concerns, you are entitled to contact our regulatory bodies:

The College of Psychologists of Ontario  
110 Eglinton Avenue West, Suite 500  
Toronto, Ontario, M4R 1A3  
Tel: 416.961.8817 | 1.800.489.8388 | Fax: 416.961.2635  
[www.cpo.on.ca](http://www.cpo.on.ca)

The College of Registered Psychotherapists of Ontario  
375 avenue University, Suite 803  
Toronto, Ontario, M5G 2J5  
Tel: 416.479.4330 | 1.844.712.1364 | Fax: 416.639.2168  
[www.crpo.ca](http://www.crpo.ca)

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

Information and Privacy Commissioner of Ontario  
112 Kent Street  
Ottawa, Ontario, K1A 1H3  
Phone: 613.995.8210 | 1.800.282.1376 | TTY: 613.922.9190 | Fax: 613.947.6850  
<https://www.priv.gc.ca/en/>



[www.espo-opht.ca](http://www.espo-opht.ca)  
2555 St. Joseph, Bureau 202, Orléans, Ontario, K1C 1S6  
info@espo-opht.ca  
Tel: 613.454.7770 Fax: 613.454.777