

# Privacy Policy

Maintaining the confidentiality and privacy of personal information is highly valued by the Centre for Treatment and is also mandated by law. We are committed to collecting, retaining, and disposing of personal information responsibly, and disclosing it only when consent is given or when we are mandated by law to do so. Personal information is never otherwise shared with third parties. This document outlines the policy and procedure for personal information collected and used by the Centre for Treatment. The retention, and disposal of information collected within the context of a therapeutic relationship is the responsibility of each individual therapist, and is governed by their professional regulatory body and by our [Confidentiality Policy](#).

## **Who has access to personal information?**

Information collected by the Centre for Treatment is typically handled by our Office Manager. In addition, Associate Therapists of the Centre and/or clinical practicum will often periodically access collected information. Technical and/or computer consultants may also have access to personal information, though this is closely monitored and largely restricted. All of the above are required to be familiar with this policy and the [Confidentiality Policy](#).

## **What Personal Information is collected and why?**

- **Clients**

Demographic (e.g. name, age, gender, marital status, etc.) and contact information is collected when someone requests individual or group services at The Centre for Treatment. This is for the purpose of properly assigning and referring client files to therapists and may also include referral source, emergency contact information, and insurance coverage status. Basic information about the reasons for seeking services is also collected at this time.

- **Members of the General Public**

Information collected from the general public, including professionals, is for the purposes of populating contact lists. These are used to provide notice of public and special [events](#), including our Annual General Meeting, Workshops and Training opportunities, and Fundraising initiatives. Typically this information includes names, professional designation, and professional and/or personal contact information.

- **Clinical Practicum Students, Volunteers, and Consultants**

Demographic and professional information is collected during the application process. This may include personal or professional contact information, Curriculum Vitae, Police Records checks, letters of reference, and other supporting documentation. Information may also be collected and retained with respect to work performance.

### **How is Personal Information protected?**

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 or restricted area.
- Electronic hardware is either under supervision or secured on encrypted drives and in a locked or restricted area at all times. In addition, passwords are used on computers.
- Paper information is transmitted through sealed addressed envelopes.
- Electronic information is either transmitted offline or with password protection and has identifiers removed.
- Staff are specifically trained to collect, use, and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- All staff and therapists are instructed about the proper implementation of our Privacy and Confidentiality Policies and are provided support in adhering to them.

### **How long is Personal Information retained and disposed of?**

Client referral information is kept for 10 years (or ten years after the client turns 18 in the case of children), as are records pertaining to clinical or volunteer placement or employment. Information on contact lists is kept indefinitely, though it will be deleted by request. Paper files containing information are destroyed by shredding them. Electronic information is destroyed by deleting it and, when the hardware is discarded, ensuring that the hard drive is physically destroyed.

Should the Centre for Treatment cease to exist as an organization, all contact lists and client referral information will be destroyed.

### **How do I access my Personal Information?**

With only a few exceptions, you have the right to access personal information held by The Centre for Treatment. Upon request, you will be notified which of your personal information is held by The Centre for Treatment. If there is a problem in meeting your request to access and review your personal information within 30 days of your initial request you will be notified of the reason and an alternate arrangement will be made (when possible). If you believe there is a mistake in the information in your records, you have the right to ask for it to be corrected.

Your clinical file (i.e. record of therapy/assessment) is accessed by making a request to your therapist (current or past).

### **Questions, Comments, Concerns?**

Our Privacy Information Officer, <<<insert name of current Chair here>>>, can be reached at: (613) 233-4929 Our privacy officer will attempt to answer any questions or concerns you might have about the collection, retention or disposal of your personal information. If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Privacy Information Officer. They will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal written account of the results of this investigation.

This policy is in compliance with the Personal Health Information Protection Act (PHIPA) and the Freedom of Information and Protection of Privacy Act (FIPPA).

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:

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Ottawa, Ontario, K1A 1H3

Phone (613) 995-8210

Fax (613) 947-6850

<http://www.privcom.gc.ca/>