



## **PRIVACY POLICY**

At Turning Corners Psychological Services we respect the privacy of personal information and value its importance. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. We are open and transparent as to how we handle personal information. This document describes our privacy policies.

### **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, home address or telephone number, education and training, income, ethnic background, family circumstances); *health* (e.g., health history, health conditions, health services received); or, *activities and views* (e.g., occupation/profession, religion, politics, ideas and concerns expressed by an individual). Personal information is different from business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

### **Who We Are**

Turning Corners Psychological Services includes, at the time of writing, two psychologists a social worker, an office administrator and an office manager. Both psychologists are independently licensed with the College of Psychologists of Ontario and the social worker is licensed through her professional association. On occasion we have psychologists and psychological associates that are in their licensing year and are therefore under supervised practice with the College of Psychologists of Ontario. We use a number of consultants and agencies that may, in the course of their duties, have limited access to the personal information we hold. These include computer consultants, office security and maintenance, bookkeepers and accountants, cleaners and lawyers. We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

## **Our Primary Purposes for Collecting Personal Information Are Summarized Below**

### **About Clients**

At Turning Corners Psychological Services we collect, use and disclose personal information in order to provide qualified and well-informed psychological and mental health services to our clients. Some examples of information we collect are: family history; social, emotional and behavioural functioning; presenting difficulties and concerns; areas of strength; etc. Gathered information is used to better understand the nature, intensity, severity and impact of presenting difficulties. It is used to assess resiliency factors, immediacy of need, level of risk, and to guide and inform treatment/intervention decisions and recommendations.



An additional primary purpose is to obtain information about baseline and ongoing psychological/ mental health functioning. This allows for the monitoring of treatment progress and the identification of changes that occur over time. With this information clients and their therapist can work together to develop the approaches necessary to address their needs.

In some situations, the primary purpose of collecting personal information would be to conduct an assessment in order to provide a professional opinion about the individual's psychological functioning. With the client's consent, the clinical findings would be reported to the appropriate person or agency. Examples of this could be an insurance company, Workplace Safety and Insurance Board, community practitioner, and family doctor.

### **How Consent Will Be Obtained**

It would be rare for us to collect or disclose such information without the client's expressed consent, but this might occur in an emergency (e.g., the client is unconscious) or where we believe the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from our client and we have no reason to believe that the message is not genuine). Also, please see our policy on the *Limits of Confidentiality* for additional circumstances of disclosure.

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

For members of the general public, our primary purposes for collecting personal information (e.g., contact numbers) are to make them aware of the range of psychological services available in our clinic and to direct them to the appropriate practitioner.

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). Cookies are only used to help you navigate our website and are not used to monitor you.

### **Some Additional Reasons Why We Collect Personal Information**

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 on unpaid accounts
- To call clients after the termination of ongoing treatment to follow-up on their
- Psychologists under supervised or in autonomous practice are regulated by the College of Psychologists of Ontario who may inspect our records and interview our psychologists as a part of their regulatory activities in serving the public's best interest.



- As professionals, we will report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own.
- Also, our organization believes that it should report information suggesting serious illegal behaviour to the authorities.
- Various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. In these circumstances, we may consult with professionals (e.g., lawyers, accountants) who will investigate the matter and report back to us.
- The cost of some services provided by the organization to clients is paid for by third parties (e.g. private insurance, automobile insurance, WSIB). These third-party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.
- If Turning Corners Psychological Services or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the Clinic’s records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization’s business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

*You can choose not to be a part of some of these related or secondary purposes. However, we do not, always have a choice about some of these related or secondary purposes (e.g., external regulation). We nonetheless restate that reasonable and responsible steps have been taken to protect your personal information.*

### **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 or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. Encryption software and passwords are used on computers, for all documents containing personal information.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable couriers or Canada Post.



- Electronic information is transmitted either through a direct line or has identifiers removed.
- Facsimile transmissions have a cover page which contains warnings and appropriate steps to be taken if the transmission is received in error.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfill 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.

### **Limits to Protection of Private Information**

Limits to the protection of private information include: legally mandated disclosure to Children's Aid Society, College of Psychologists of Ontario and Court orders to release information, search warrants for a file in a criminal or legal case, and subpoenas. Please see the practice's *Limits of Confidentiality* policy.

### **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 own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

Clients or other individuals we deal with may have questions about our services after they have been received. We also provide ongoing services for many of our clients over a period of months or years for which our previous records are helpful. We retain our client information for a minimum of ten years after the date of last contact for adult clients. In the case of child and adolescent clients that have ended services, records are retained for ten years past their eighteenth birthday. The retention of records enables us to respond to questions that may arise in the future.

Our client and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again. However, if you ask, we will remove such contact information right away.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is replaced or discarded, we ensure that the hard drive is physically destroyed.

### **You Can Look At Your Information**

With only a few exceptions, you have the right to see what personal information we hold about you. We can help you identify what records we may have about you. We will also try to help you understand any information you do not understand (e.g., abbreviations, technical language, etc.). We may need to confirm your identity, if we do not know you,



before providing you with this access. We reserve the right to charge a fee for such requests. We may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

If you believe there is a mistake in your personal information, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have formed. We may ask you to provide documentation that our files are wrong. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

### **Do You Have Any Questions?**

Our Information Officer is Dr. Neil Gottheil and he will attempt to answer any questions or concerns you might have.

He can be reached at:

*Turning Corners Psychological Services*

*2186A Thurston Drive*

*Ottawa, Ontario K1G 6E1*

*Phone: (613) 321-0642 | Fax (613) 321-9247*

[www.TurningCorners.ca](http://www.TurningCorners.ca)

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. He will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal written decision with reasons.

If you have a concern about the professionalism or competence of our services or the mental or physical capacity of any of our professional staff we would ask you to discuss those concerns with us. However, if we cannot satisfy your concerns, you are entitled to voice your concerns to our 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*

[www.cpo.on.ca](http://www.cpo.on.ca)

This policy is made under the Personal Information Protection and Electronic Documents Act. That is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are 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 also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

*112 Kent Street*

*Ottawa, Ontario K1A 1H3*

*Phone (613) 995-8210 | 800-282-1376 | Fax (613) 947-6850 | TTY (613) 992-9190*

[www.privcom.gc.ca](http://www.privcom.gc.ca)