

Marie-Claire Turgeon

MCT Counselling Services

MCT COUNSELLING SERVICES PRIVACY POLICY

Privacy of personal information is an important principle to MCT Counselling Services. I, Marie-Claire Turgeon, am committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for services I provide. I am open and transparent as to how I handle personal information. This document describes my 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 phone number, education and training, family circumstances); health (e.g., health history, health conditions, health services received); or, activities and views (e.g., occupation/profession, 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 I AM

MCT Counselling Services includes Marie-Claire Turgeon and I use a number of consultants that may, in the course of their duties, have limited access to personal information I hold. These include computer consultants, office security and maintenance, bookkeepers and accountants, temporary workers to cover holidays, cleaners and lawyers. Their access is restricted to any personal information held as much as is reasonably possible. I also have their assurance that they follow appropriate privacy principles.

MY PRIMARY PURPOSES FOR COLLECTING PERSONAL INFORMATION ARE SUMMARIZED BELOW:

About Clients

I collect, use and disclose information only in order to provide counselling services to my clients. For example, I collect information about a client's health history, including their family history, physical condition and function and social situation in order to help us assess what their mental health needs are, to advise them of their options and then to provide the counselling services they choose to have. A secondary primary purpose is to obtain a baseline of health and social information so that in providing ongoing counselling services I can identify changes that are occurring over time. It would be rare for me to collect such information without the client's express consent, but this might occur in an emergency (e.g., the client is unconscious) or where I believe the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from my client and I have no reason to believe that the message is not genuine).

In some situations, the primary purpose of collecting personal information would be to conduct an assessment to provide a professional opinion about the individual's psychological functioning. With the client's consent, the opinion would be reported to the appropriate person or agency, for example, an insurance company, Workplace Safety and Insurance Board, psychological/legal reports, no-fault automobile insurance, Children's Aid Society, Ministry of Children and Youth services, Correctional Services of Canada, and rehabilitation companies.

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It would be rare for me to collect or disclose personal information without the client's express consent, but this might occur in an emergency (in this case the client would be notified in writing as soon as possible) or if I believe the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from my client and I have no reason to believe that the message is not genuine).

About Members Of The General Public And Who Call For Information About My Services

For members of the general public, my 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 MCT Counselling Services in general or my office in particular. For example, while I try to use work contact information where possible, I might collect home addresses, fax numbers and email addresses. I try to obtain consent before using any such personal information, but where this is not, for any reason, possible, I will upon request immediately remove any personal information from my distribution list

HERE ARE SOME ADDITIONAL REASONS WHY I COLLECT PERSONAL INFORMATION.

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

- To invoice clients for services not paid for at the time or to collect unpaid accounts.
- Psychologists in supervised or 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 the public interest. The College of Psychologists of Ontario has its own strict privacy obligations.
- The cost of some services provided by the organization to clients is paid for by third parties (e.g., private insurance, WSIB, automobile insurance, First Nations and Inuit Health Branch, Canadian Forces, CUPE, Ministry of Children and Youth Services). These third party payers often have your consent or legislative authority to direct me to collect and disclose to them certain information in order to demonstrate client entitlement to this finding (e.g., Canadian Forces identification, First Nations identification).

PROTECTING PERSONAL INFORMATION

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

- Paper information is either under supervision or secured in a locked or restricted area at all times.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. Encryption and passwords are used on computers.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable couriers or Canada Post.
- Electronic information is transmitted through a dedicated line only to people and agencies that have a privacy policy.
- All Consultants and staff I may use are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with my privacy policy.

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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 a legal case, and subpoenas.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

I need to retain personal information for some time to ensure that I can answer any questions you might have about the services provided and for my own accountability to external regulatory bodies. However, I do not want to keep personal information too long in order to protect your privacy.

I keep my client files for seven years. My client and contact directories are much more difficult to systematically destroy, so I remove such information when I can if it does not appear that I will be contacting you again. However, if you ask, I will remove such contact information right away. I keep any personal information relating to my general correspondence (i.e., with people who are not my clients), newsletters, seminars and marketing activities for about six months after the newsletter ceases publication or a seminar or marketing activity is over.

I destroy paper files containing personal information by shredding. I destroy electronic information by deleting it and, when the hardware is discarded, I 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 I hold about you. Often all you have to do is ask. I can help you identify what records I might have about you. I will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). I will need to confirm your identity, if I do not know you, before providing you with this access. I reserve the right to charge a nominal fee for such requests.

If there is a problem I may ask you to put your request in writing. If I cannot give you access, I will tell you within 30 days if at all possible and tell you the reason, as best as I can, as to why I cannot give you access.

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

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DO YOU HAVE A QUESTION?

I am the information officer, Marie-Claire Turgeon, and can be reached at:

220 Kennevale Suite 200
Nepean, ON K2J 6B6
Phone: (613) 715-3763

I will attempt to answer any questions or concerns you might have.

If you wish to make a formal complaint about my privacy practices, you may make it in writing to me. I will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

If you have a concern about the professionalism or competence of my services or the mental or physical capacity of any of my professional staff I would ask you to discuss those concerns with me. However, if I cannot satisfy your concerns, you are entitled to complain to my regulatory body:

CHAIRPERSON
CCA ETHICS COMMITTEE
CANADIAN COUNSELLING AND PSYCHOTHERAPY ASSOCIATION
16 CONCOURSE GATE, SUITE 600
OTTAWA, ON K2E 7S8

Envelopes must be marked "**Confidential**".

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 enquiries, 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, ON, K1A 1H3

Phone: 613-995-8210
Toll-free: 1-800-282-1376
Fax: 613-947-6850
TTY: 613-992-9190
www.privcom.gc.ca

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