

PRIVACY AND PERSONAL INFORMATION PROTECTION POLICY

Purpose

This Privacy and Personal Information Protection Policy outlines a commitment to principles and practices intended to protect the privacy and security of personal information collected by Grünberg Patterson Counselling & Psychological Services. This policy reflects compliance with the following:

- *College of Psychologists of British Columbia - Code of Conduct*
- *British Columbia Psychological Association – Code of Ethics*
- *British Columbia Association of Clinical Counsellors – Code of Ethics*
- *Canadian Counselling and Psychotherapy Association – Standard of Practice*
- *Personal Information Protection and Electronics Documents Act (PIPEDA)*
- *British Columbia Health Professionals Act (BCHPA)*

What is Personal Information?

Personal information about an identifiable individual includes information that relates to personal characteristics (e.g., gender, age, home address, phone number, etc.), education (e.g., degree, year of graduation, institution and specialization, etc.) or activities and views (e.g., opinions expressed by an individual, evaluation of an individual, etc.).

Personal information is to be contrasted with business information (e.g., an individual's business address, phone number, etc.), which is not protected by privacy legislation. The authority to collect personal information from clients, employees and/or contractors is implied in order to provide services or employment.

Information Gathered

Personal characteristics include, but is not limited to:

- Name, age, home contact information, other or emergency contact information, types of services requested, language preferences, gender, educational or health care records, employment information, etc.

Primary purpose of collecting information:

- To provide appropriate services to clients
- To assist clients and families in accessing services and resources recommended through therapy and assessment
- To maintain paper and electronic records
- To track services provided and billing or be able to communicate effectively with third party payers

Access to Personal Information

Individuals have a right to inspect their personal information that is in the possession of Grünberg Patterson Counselling & Psychological Services.

Employees of Grünberg Patterson Counselling & Psychological Services, in the course of their duties, have access to personal information that is collected. There are a limited number of external individuals who may, in the course of their duties, have limited access to personal information. We restrict their access and obtain their assurance that they follow appropriate privacy principles and practices. These individuals include, but are not limited to, bookkeepers, accountants, legal counsel and/or contractors.

Consent

Expressed consent is sought whenever personal information is collected.

Safeguards to Protect Personal Information

Location of Paper Information:

- Office areas restricted to clinicians or staff
- Policy that all files are locked after hours
- Policy that secure office areas after hours
- Policy defining levels of access

While in Transit to Another Location:

- Policy that files must be in the personal custody of clinicians or staff
- Policy that files be locked away while unattended

Home Office:

- Policy regarding removal of files from office
- Policy that files be locked away while unattended

Location of Electronic Information:

- Computer access restricted to clinicians and staff only
- Password protection for each terminal
- Unique user identification with passwords
- Policy defining levels of access

Transfer of Papers Information

- In sealed envelope marked private and confidential sent by Canada Post or bonded courier
- In sealed envelope delivered by clinicians or staff
- In sealed envelope to be picked up by client – envelopes kept out of sight in public areas

Transfer of Electronic Information

- Regardless of medium, all documents sent electronically are password protected and access restricted to the intended recipient
- Through email with the consent of clients or parents or legal guardians of clients who are minors
- Through fax with a cover sheet with a privacy clause
- Through a disc, CD or other storage medium that is treated with the same safeguards as paper information

General Safeguards

Staff is trained in the following:

- The importance of personal information protection
- Access to personal information is on a need to know basis
- Grünberg Patterson Counselling & Psychological Services Privacy and Personal Information Protection Policy
- Sensitivity in collecting and using personal information when others might hear
- When to remove or mask information when providing copies
- To recognize and avoid being solicited for information
- How to discard information
- To avoid discussing personal information in public places
- Annual review of privacy policy and practices

Privacy and Security Agreements with the following:

- Temporary or contract employees
- Bookkeepers and Accountants
- Attorneys
- Building management

Regular and systematic monitoring of compliance.

Changing of passwords on a regular basis.

If information is compromised, clients will be notified.

Retention and Disposition of Personal Information

Personal information held by Grünberg Patterson Counselling & Psychological Services about clients and/or parents or legal guardians of clients who are minors, will be destroyed after 7 years after service has ended. Such information will be destroyed in a manner designed to protect client privacy.

Records and assessment reports for minors are retained until they reach the age of majority.

Openness

Grünberg Patterson Counselling & Psychological Services is committed to insuring that this policy is available to the public in the following ways:

- Staff are trained to provide the policy to those who request it
- The policy is provided to each employee and/or contractor
- The policy is posted on our website at www.grunbergpatterson.ca
- The policy is provided to all new clients at intake

Privacy Policy Pertaining to Employees and Contractors

Information gathered:

- Name, home contact information, emergency contact information, SIN, gender, age, marital status (for insurance purposes after employment only) education and training, previous employment history and references, marital status, Police Information check, confidentiality agreement, disciplinary actions against the individual, financial data, communications with Grünberg Patterson Counselling & Psychological Services and employee evaluations.

The primary Purpose for collecting this data is for employment suitability.
The authority to collect this information is implied or by written consent.

Complaints

While privacy and confidentiality are the responsibility of all members of the Grünberg Patterson Team, complaints can be directed to Dr. Serena Patterson and/or Monika Grünberg.