

## **Tyndale Counselling Services Privacy Policy**

In addition to the general privacy policy of Tyndale University, Tyndale Counselling Services has its own privacy policy as its practice falls under the Regulated Health Professionals Act (RHPA 1991).

Tyndale Counselling Services is committed to protecting your privacy and safeguarding your personal information. This is one of the main tenets of our service and is therefore one of our highest priorities. The privacy policy of Tyndale Counselling Services is comprehensive and complies with the requirements of PHIPA (Personal Health Information Protection Act 2004) and the 10 principles appended to the Personal Information Protection and Electronic Documents Act ("PIPEDA").

PHIPA provides the rules for the collecting, using and disclosing of personal health information: protecting the confidentiality of the individual's information and the privacy of the individual with respect to that information, while ensuring that effective health care is provided.

Personal Health Information (PHI) refers to information both oral and written, that identifies an individual and relates to the person's physical or mental health. At Tyndale Counselling Services this information includes demographics, medical and mental health histories, insurance information and payments and is used to help determine appropriate levels of care.

### **How information is collected and used**

- Client Information is collected primarily through intakes and regular sessions. Other means include appointment requests and disclosure of information to persons to whom there is express authorization to do so.
- The information collected is used to provide service that is suitable for the client including but not limited to therapy, collaborating with other professionals involved in the care of the client, and invoicing third parties for payment.
- Non-identifying client information is used to provide statistical input into the improvement of our counselling services.
- Clients who agree to participate in research are provided with details of the research and provide their written consent to do so. Research is approved by the appropriate research ethics board(s).

### **Disclosing information and exceptions**

Information shared in therapy is treated as confidential and will not be shared with any office or individual outside our Tyndale Counselling Services team without the client's signed and informed consent. Clients in couple, family or group therapy are responsible for the confidentiality of information they share in the group.

Under some circumstances, therapists are legally and ethically bound to disclose certain specific and relevant information to appropriate individuals or agencies. These circumstances include: reason to believe the client in therapy is a danger to themselves or may do harm to another person; reason to believe a minor has been, is, or may be in danger of neglect or abuse; response to a court order; a client reports reasonable suspicion or knowledge that a resident in a Long Term Care facility in Ontario is suffering or has suffered harm as a result of abuse or negligence by staff in the home; the therapist has reasonable grounds to believe another regulated health professional has sexually abused a client or patient.

In other cases, your therapist may share specific and relevant information with appropriate organizations without your consent. These circumstances include: reason to believe that another therapist has caused or is likely to cause you harm, a medical emergency or a court subpoena of your records.

#### **How information is kept private**

Visual and auditory privacy are taken into consideration throughout the counselling centre and are enhanced by the use of closed office spaces and white noise. Offsite locations used for online therapy meet requirements for visual and auditory privacy. Client records and therapy-related materials are securely and confidentially maintained for a minimum of ten years following the completion of the last therapy session, after which time, under normal circumstances, paper documents are destroyed in a complete, responsible and professional manner. Video recordings are deleted on a regular basis.

#### **Clients access to their records**

Clients have a right to access their information and to correct errors in the presence of a therapist, supervisor, manager or director. The process is initiated by a written request from the client. Clients have a right to make a complaint if they identify errors in their personal health information.

#### **Privacy breach**

Should you feel that there is a breach of your personal health information, please contact Wilma Nevers, Manager. You may also contact the CRPO: 375 University Avenue, Suite 803, Toronto, ON M5G 2J5, 1-844-712-1364 or 416-479-4330) and the Information and Privacy Commissioner of Ontario (IPC) at: 2 Bloor Street East, Suite 1400, Toronto, ON M4W 1A8 (416-326-3333 ) In the event of a privacy breach, Tyndale Counselling Services will follow the Tyndale Breach Notification Process.

#### **Changes**

When changes are made to our Privacy Policy, we will make the updated version available.