

Privacy Policy of Bright Lights Psychology Clinic

Privacy of personal health information is an important principle to Bright Lights Psychology Clinic. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. We also strive to be open and transparent as to how we handle personal information. This document describes our privacy policies.

WHAT IS PERSONAL HEALTH 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, income, home address or phone number, ethnic background, family status); health (e.g., health history, health conditions, health services received by them); or activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is different from business information (e.g., an individual's business address and telephone number). This is not protected by privacy legislation.

WHO WE ARE

Bright Lights Psychology Clinic, at the time of writing, includes a clinic director, clinical staff, academic interventionists, and administrative support staff.

WE COLLECT PERSONAL INFORMATION: PRIMARY PURPOSES

About Clients:

We collect, use and disclose personal information in order to serve our clients. Typically, we collect information for the purposes of assessment and psychotherapy.

For Therapeutic Intervention:

We collect information about a client's history, including family history, social situation and emotional functioning in order to help us assess what their psychotherapy needs are, to advise them of their options and, should they choose, to provide therapy.

For Assessment:

Psychological assessment is intended to answer questions about the client's intellectual, academic, social and/or emotional functioning. This is typically accomplished through standardized and informal testing, interview(s), questionnaire(s), observation, and review of previous records and reports.

For Academic Intervention:

Academic Intervention is intended to address concerns about the client's academic functioning. This may be accomplished through interview(s), questionnaire(s),

observation, learning remediation, and review of previous records and reports.

A second primary purpose is to obtain a baseline of assessment information so that, in providing ongoing services, we can identify changes that occur over time.

About Members of the General Public

Members of the general public may contact the Clinic requesting service for themselves or their children. Our intake coordinators gather this information and provide it to the registered faculty and students who are about to begin assessments and/or psychotherapy. Some of these referrals become clinic cases; other referrals are not seen. This referral information is retained to maintain an accurate chronology of requested services.

We Collect Personal Information: Related and Secondary Purposes

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:

- Our Clinic invoices clients for assessment, psychotherapy, and academic intervention services

- Our Clinic reviews client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external consultants (e.g., auditors, lawyers, practice consultants, voluntary accreditation programs) may on our behalf do audits and continuing quality improvement reviews of our Clinic, including reviewing client files and interviewing our staff. All persons involved in these activities are required by law to maintain the confidentiality of any accessed information.

- Psychologists and Psychotherapists are regulated by the College of Psychologists of Ontario and the College of Registered Psychotherapists of Ontario who may inspect our records and interview our staff as a part of their regulatory activities in the public interest. In addition, 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 behavior to the authorities. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients, or other individuals, to support the concern (e.g., improper services). Also, like all organizations, 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. All persons involved in these activities are required by law to maintain the confidentiality of any accessed information.

The cost of some goods/services provided by the organization to clients is paid for by third parties (e.g., OHIP, WSIB, private insurance, Assistive Devices Program). These third-party payers must have the client's consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate a client's entitlement to this funding.

Clients or other individuals with whom we deal may have questions about our services at some point 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 last contact (or in the case of children—10 years after their 18th birthday) to enable us to respond to those questions and provide these services (our regulatory College also requires us to retain our client records).

PROTECTING PERSONAL INFORMATION

We understand the importance of protecting personal information. Records relating to all clinic clients are confidential. In general, this means that no information contained in records are provided to a third party without written consent of the client. [There are some specific ethical or legal circumstances when this confidentiality requirement is waived. For example, clinicians shall reveal information when there is a suspicion of child abuse, when clients pose a significant danger to themselves or others, when clients report sexual abuse by a healthcare professional, or when the court issues a subpoena for records or testimony.]

Staff members are allowed to access only that information related to the effective performance of their professional responsibilities and job description. All personnel are trained in the need for privacy and confidentiality. They are also trained in the Clinic's privacy policies and procedures, including prevention of record loss and unauthorized access. Personnel who know a client personally are required to declare this and to remove themselves from access to that client's record unless there is an emergency or unless the client has given express consent for access.

In addition, we take the following precautions when storing or moving client information:

Paper information is either under supervision or secured in a locked or restricted area.

The Clinic makes use of a secure, web-based practice management system to store and manage our client records. This includes information such as client appointments, billing documents, session notes, contact details, and other client-related information and documents. The system we use is encrypted, has servers exclusively located in Canada (Toronto and Montreal), and access to the system is granted only on an as-needed basis and governed by our strict confidentiality policy. Additionally, all practice data in the system is routinely backed up to ensure the privacy and protection of sensitive client information and to assist us with PHIPA compliance.

Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.

Paper information is transmitted through sealed, addressed envelopes.

Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy and with the ethical requirement of confidentiality.

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.

We keep our client files for approximately ten years after the last significant client contact or, in the case of children, for ten years after they turn 18 year of age. We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed.

DATA BREACH PROTOCOL

In the case that personal health information has been accessed, used, disclosed or disposed of in an unauthorized manner, the Clinic will comply with PHIPA requirements in investigating and responding to the incident, including any reasonable request for information relating to the individual(s) affected in the incident.

YOU CAN LOOK AT YOUR INFORMATION

With only a few exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you do

not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge a nominal fee for such requests.

If there is a problem, 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 the 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 A QUESTION OR CONCERN?

If you have been a Clinic client and have questions about your personal information, you may contact the Clinic Information Officer.

The Clinic's Information Officer is the Clinic Director, Dr. Todd Cunningham, reachable at:

Dr. Todd Cunningham
Bright Lights Psychology Clinic
726 Bloor Street West, Suite 310
Toronto, Ontario
M6G 1L4
Phone: (647) 542-3433

If you wish to make a formal complaint about our privacy practices, you may make it to the Clinic's Information Officer. They will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal written decision with the rationale for this outcome.

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 contact the College of Psychologists of Ontario or the College of Registered Psychotherapists of Ontario:

College of Psychologists of Ontario
110 Eglinton Ave W, Suite 500
Toronto, Ontario

M4R 1A3
Phone: (416) 961-8811

College of Registered Psychotherapists of Ontario
375 University Avenue, Suite 803
Toronto, ON M5G 2J5
Phone: 416-479-4330
Fax: 416-639-2168

This policy is made under the Personal Health Information Act, 2004. This 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 Ontario oversees the administration of the privacy legislation in the private sector.

This commissioner also acts as a kind of ombudsperson for privacy disputes. The Information and Privacy Commissioner of Ontario can be reached at the following address:

Information and Privacy Commissioner of Ontario
2 Bloor St E #1400, Toronto, ON M4W 1A8
Phone: 416-326-3333 | 1-800-387-0073
Fax: 416-325-9195
TTD/TTY: 416-325-7539
<https://www.ipc.on.c>

This privacy policy was last updated on September 12th, 2022.