



Privacy Policy

Privacy of personal information is an important principle at ThinkWell Centre for Cognitive Behaviour Therapy (henceforth referred to as ThinkWell CBT). We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. We also try to be 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, 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

At the time of writing this privacy policy, ThinkWell CBT employs one psychologist, Dr. Jennifer Tapscott. In the course of providing psychological services to the public, ThinkWell CBT also makes use of a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These include computer consultants and software providers (Owl Practice Inc., Hush Communications Canada Inc.), bookkeepers and accountants (Peggy Seville), credit card and financial services companies (Stripe), and lawyers (Ian Gavaghan). We restrict their access to any personal information we hold as much as is reasonably possible, providing only that information required by them to provide the service for which they are hired. We also have their assurance that they follow appropriate privacy principles.

WE COLLECT PERSONAL INFORMATION: PRIMARY PURPOSES

About Clients

Like all mental health professionals, we collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal information is to provide psychological services. For example, we collect information about clients' past and current psychological functioning, physical health conditions, and family and social circumstances in order to help us assess their mental needs, advise them of their treatment options, and then provide the treatment they choose. A second primary purpose is to obtain a baseline of mental health information so we can identify changes that occur over the course of psychological intervention. It would be rare for us 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 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).

About Members of the General Public

For members of the general public, our primary purpose for collecting personal information is to be able to communicate with them about the psychological services offered at ThinkWell CBT that they have expressed explicit interest in learning about (e.g., to answer any general inquiries left via voicemail or electronic communication, to provide notice of upcoming services identified as of interest to them). Typically, the information collected would be limited to their name, telephone number, email address, and



the nature of their inquiry or reason that they would like to be contacted. We try to obtain consent before using any such personal information, but where this is not, for any reason, possible, we will upon request immediately remove any personal information from our distribution list.

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, to register for a course, to subscribe to our newsletter). Cookies are only used to help you navigate our website and are not used to monitor you.

About Contract Staff, Volunteers, and Students

For people who are contracted to do work for us (e.g., administrative assistant), our primary purpose for collecting personal information is to ensure we can contact them in the future (e.g., for new assignments) and for necessary work-related communication (e.g., sending out paycheques, year-end tax receipts). Examples of the type of personal information we collect for those purposes include home addresses and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of a health emergency (e.g., a COVID outbreak) or to investigate a possible breach of law (e.g., if a theft were to occur in the office). If contract staff, volunteers, or students wish a letter of reference or an evaluation, we will collect information about their work related performance and provide a report as authorized by them.

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:

- ❑ To invoice clients for services that were not paid for at the time, to process credit card payments, or to collect unpaid accounts.
- ❑ To advise clients and others of special events or opportunities (e.g., a new workshop, upcoming group service) that we have available.
- ❑ To engage in program evaluation to improve service delivery, for example, by evaluating the effectiveness of the psychological interventions provided at ThinkWell CBT or assessing client satisfaction with services.
- ❑ Psychologists are regulated by the College of Psychologists 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. 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.
- ❑ The cost of some services provided to clients by ThinkWellCBT is paid for by third parties (e.g., WSIB, private insurance). 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.
- ❑ 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 last contact to enable us to respond to those questions and provide these services (our regulatory College also requires us to retain our client records).

You can choose not to be part of some of these related or secondary purposes (e.g., by declining to receive notice of upcoming services, by paying for your services at the time of service delivery through means that do not require collection of credit card information, by withholding consent for your de-identified outcome data to be used in program evaluation). We do not, however, have much choice about some of these related or secondary purposes (e.g., external regulation).

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. In addition, passwords are used on computers. All of our cell phones are digital as these signals are more difficult to intercept.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line or has identifiers removed or is encrypted.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfil 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.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

We are required to retain personal information for at least 10 years from the date of last clinical contact 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 for longer than necessary in order to protect your privacy.

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 discarded, we ensure that the hard drive is physically destroyed. Alternatively, we may send some or all of the client file to our client.

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?

Our Information Officer, Dr. Jennifer Tapscott, can be reached at:

623 Fortune Cres. | Kingston, ON | K7P 0E5
Phone (343) 338-4465 | Email drtapscott@thinkwellcbt.ca

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

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. She 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 complain to our regulatory body:

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 | Email cpo@cpo.on.ca
www.cpo.on.ca

This policy is made under the Personal Health Information Protection Act.

For more general inquiries, the Information and Privacy Commissioner of Ontario oversees the administration of the privacy legislation. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

INFORMATION AND PRIVACY COMMISSIONER OF ONTARIO
2 Bloor Street East, Suite 1400, Toronto, Ontario M4W 1A8
Phone (416) 326-3333 | 800-387-0073 | Fax (416) 325-9195 | TTY (416) 325-7539
www.ipc.on.ca