



Dr. Martine Roberge
CHILD PSYCHOLOGIST
Children | Youth | Families

PRIVACY POLICY

Privacy of personal information is an important principle to us. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and 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.

COLLECTION OF PERSONAL INFORMATION: PRIMARY PURPOSES

About Clients

I collect, use and disclose personal information in order to serve my clients. For my clients, the primary purpose for collecting personal information is to provide psychological services. For example, I collect information about a client's mental health history, including their developmental history and family functioning in order to help me assess what their mental health needs are and to provide recommendations. A second primary purpose is to obtain a baseline of mental health and behavioural and social information so that in providing ongoing psychological services I can identify changes that occur over time.

COLLECTION OF PERSONAL INFORMATION: RELATED AND SECONDARY PURPOSES

Like most organizations, I 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 seminar, development of a new service, arrival of a new product) that we have available.
- As a psychologist, I am 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. Also, our organization believes that it should report information suggesting serious illegal behaviour 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.
- 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 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.

You can choose not to be part of some of these related or secondary purposes (e.g., by declining to receive notice of special events or opportunities, by paying for your services at the time of the service). We do not, however, have much choice about some of these related or secondary purposes (e.g., external regulation).

COLLECTION OF PERSONAL INFORMATION: ONLINE RECORD KEEPING AND PRACTICE MANAGEMENT

In administering our practice, we now make use of a secure, web-based practice management system (owlpractice.ca) to store and manage our client records. This system 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 insure the privacy and protection of sensitive client information and to assist us with PHIPA compliance. Owl Practice system includes online intake and consent process, a client portal and online booking. All of the services offered by Owl Practice are secure and completely confidential. For more information regarding their security policy, you can consult their website: <https://faq.owlpractice.ca/security-and-compliance/security>.

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.
- 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.
- 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 fulfill their duties and in accordance with our privacy policy.

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. The College of Psychologists of Ontario requires that we retain our client information for a minimum of ten years after the last contact or in the case of children, after they turned 18 years old to enable us to respond to those questions and provide these services.

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 keep any personal information relating to our general correspondence (i.e., with people who are not clients) newsletters, seminars and marketing activities for about six months after the newsletter ceases publication or a seminar or marketing activity is over.

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.

REVIEW OR ACCESS TO YOUR PERSONAL INFORMATION

With only a few exceptions, you have the right to see all the information in your file. 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?

If you have any question regarding my privacy practice, I, Martine Roberge, can be reached at:

370 Churchill avenue North suite 101 | Ottawa, ON | K1Z 5C2
PHONE (819) 918-0611

If you wish to make a formal complaint about my 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:

The 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
www.cpo.on.ca

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 inquiries, 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, Ontario K1A 1H3
Phone (613) 995-8210 | 800-282-1376 | Fax (613) 947-6850 | TTY (613) 992-9190
www.privcom.gc.ca