

Inner Wellness Counselling Services

Privacy Policy

The following privacy policy is made in consideration of the (federal) Personal Information Protection and Electronic Documents Act, 2004 (PIPEDA) and the (provincial) Personal Health Information Protection Act, 2004 (PHIPA). It outlines the privacy practices and policies of Inner Wellness Counselling Services and provides information about confidentiality and laws related to the collection, use and disclosure of your personal health information while engaged in services through Inner Wellness Counselling Services.

We are committed to collecting, using, and disclosing personal information responsibly and only to the extent necessary for the delivering therapy services and managing business matters as they relate to providing these services. We strive to be open and transparent about the handling of clients' personal information.

What is Personal Information?

The term "personal information" (as used in this Privacy Policy) has the same meaning as set out in PIPEDA and means any information about an identifiable individual including (but not limited to) contact information, name, address, phone number or email address, gender, date of birth, and any data about yourself that you choose to disclose.

The term "personal health information" has the same meaning as set out in PHIPA, and includes information relating to your physical or mental health, as well as your health history, medical records, prescriptions, and your health number.

In this Privacy Policy, the term personal information also encompasses personal health information.

Personal information is different from business information (e.g., an individual's business address and business phone number), which is not protected by privacy legislation.

Collection and Use of Personal Information?

Our primary purpose of collecting personal information is to serve our clients through the services of psychotherapy, which involves collecting information about a client's history (e.g., family history, cognitive and emotional functioning, and social situation) in order to help us assess their mental health needs, to advise them of their options, to develop treatment goals and plans, and to provide them with the psychotherapy services that they choose. It also enables us to establish a baseline of assessment and ongoing record of psychological functioning so that we can monitor treatment progress and identify changes occurring over time.

For members of the general public who contact Inner Wellness Counselling Services to inquire about services for themselves, collected personal information will be documented and retained to maintain an accurate chronology of requested services, regardless of whether or not they become a client.

Like most organizations, we also collect, use, and disclose information for purposes related to, or secondary to, my primary purposes. The most common examples of related and secondary purposes are as follows:

- to invoice clients and collect payments that were not paid for at the time of service
- to advise clients and others of opportunities relevant to them (e.g., development of new service, seminar, service)

Third party payers, when applicable, may request specific information about your healthcare:

- Extended-health benefits insurers, for example, often have your consent for us to release information about session dates, duration and the clinical provider's information (name, title, registration number); and
- Auto insurers, WSIB, Long-Term Disability insurers and legal representatives may request information related to your health conditions, treatment needs, treatment progress and disability in order to make determinations of your entitlement to funding

In these cases, we will ask for your express written consent to disclose to them certain information to demonstrate your entitlement to this funding.

Protecting Personal Information

We are committed to protecting the security of our clients' personal information. For that reason, we have taken the following steps:

- Paper information is either under supervision or secured in a locked area, container, or filing cabinet.
- Electronic hardware is either under supervision or secured in a locked or restricted area. Computers are password protected and USB drives are encrypted.
- We use 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 and its servers are exclusively located in Canada.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.

- Any messages sent via email will only be retained for the minimum time needed and will be deleted promptly. Clients must provide express written consent to use email correspondence, as communication over the internet is neither secure nor verifiable. Clients are discouraged from sharing information of a personal nature by email due to this lack of security.
- Transmission of any paper information (e.g., requests for a chart copy or notes) is performed via sealed, addressed envelopes or boxes by reputable companies and only when specifically requested by a client, their representative, or other healthcare providers.

We offer both virtual (video) and telephone-based options for assessment and treatment services. Virtual and telephone-based sessions are also mental health services, and these have the same purpose or intention as treatment sessions that are conducted in-person. We will discuss which mode of service is recommended based on your needs, and changes can be made throughout the course of your treatment with respect to the mode of therapy we both decide to use.

Virtual care is offered through the Jane App video conferencing platform. Jane App videoconferencing meets Canadian privacy laws and is privacy compliant. Virtual care requires the use of a webcam or smartphone, and a link to the virtual session will be provided by e-mail prior to the session. We highly recommend you test your video/audio settings the day before your session and contact Jane App's tech support for assistance if needed. In the event of technical problems during your session, a back-up plan (e.g., a phone number where you can be reached) will be used to restart the session or to reschedule it. We may elect to use a different video conferencing platform; the benefits and risks of that platform will be discussed with you prior to beginning virtual sessions.

Telephone-based sessions will involve your therapist contacting you by phone at your scheduled appointment time. Please note that in some cases, the Caller ID may show up as "Unknown" or "Blocked". We ask you to ensure you are available and can answer the call at the scheduled appointment time.

Engaging in treatment using virtual care or by telephone encompasses risks that should also be considered. Please note the following rights and risks in using virtual and telephone-based services:

- The laws and professional standards that apply to regular mental health services apply to virtual and telephone-based care.
- Despite best efforts to ensure high standards of technology, there is always a risk that services could be disrupted or distorted by unforeseen technical problems.

Consent to the use of virtual and telephone-based sessions indicates your agreement with the following conditions:

- Confidentiality still applies for mental health tele-services, and the session will not be recorded by me or yourself without permission from the other person(s).
- It is important to be in a quiet, private space that is free from distractions during the session.
- It is important to use a secure internet connection rather than public/free Wi-Fi.

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 services provided, and for our own accountability to external regulatory bodies.

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.

If your therapist dies or becomes unable to practice for any reason, your file will be forwarded to and become the responsibility of an alternate designated clinician.

Data Breach Protocol

If your information is stolen, lost or accessed by an unauthorized person, we would be responsible for notifying you of this security breach at the first reasonable opportunity and taking any required steps, such as notifying the Privacy Commissioner of Ontario.

Looking at Your Personal Information

With a few rare 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 that you do not understand (e.g. short forms, technical language, etc.). We reserve the right to charge a nominal fee for such requests. Should you wish to have copies of information contained in your file, we will review your file with you before we release any information to you.

If there is a problem, we may ask that you put your request in writing. If we cannot provide you with access, we will tell you within 30 days, if possible, and tell you the reason as to why we cannot give you access (e.g., because the requested information reveals a third party and/or may jeopardize the health or safety of a third party; because the information relates to a legal proceeding, subpoena, or a warrant).

If you believe that 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.** If necessary, we will ask you to provide documentation

that information in the file is wrong. Where we agree that a mistake was made, the correction will be made, and we will notify anyone to whom the original information was sent. If we do not agree that a mistake was made, we will still agree to include in the file a brief statement from you on the point(s) and we will forward that statement to anyone else who received the earlier information.

Google Analytics and Cookies

We may use a tool called “Google Analytics” to collect information about use of this Site, such as how often users visit the Site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. Google Analytics collects only the IP address assigned to you on the date you visit this Site, rather than your name or other identifying information. Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this Site. This cookie cannot be used by anyone but Google, Inc. The information generated by the cookie will be transmitted to and stored by Google on servers in the United States. We use the information received from Google Analytics only to improve services on this Site. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Privacy Policy <http://www.google.com/policies/privacy>. You can prevent Google Analytics from recognizing you on return visits to this Site by disabling the Google Analytics cookie on your browser.

Changes in Our Practices

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make material changes to this Policy, we will notify you here, by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.

Correcting, Updating and Removing Personal Information

You may alter, update or deactivate your account information or opt out of receiving communications from us at any time. You may send an email to the Privacy Officer at Inner Wellness Counselling Services listed below. We will respond to your request for access or to modify or deactivate your account within thirty (30) days.

Do You Have Any Questions?

If you have any questions about our privacy policy, practices, or procedures, I encourage you to contact me directly:

Michelle Dzialakiewicz
Privacy Officer
Inner Wellness Counselling Services
London, ON
Tel: (519) 914-5884
Email: info@innerwellnesscounselling.ca

If you wish to make a formal complaint about our privacy practices, please do so in writing to me. I will acknowledge receipt of your complaint, ensure that it is investigated promptly, and that you are provided with a formal decision and reasons in writing.

If we cannot satisfy or resolve your concerns, or you have a concern about the professionalism or competence of our work as registered social workers, you have the right to file a complaint with our regulatory body:

The Ontario College of Social Workers and Social Service Workers
250 Bloor Street East, Suite 1000, Toronto, Ontario M4W 1E6
Tel: (416) 972-9882
Fax: (416) 972-1512
Web: www.ocswssw.org

This privacy policy adheres to the Personal Health Information Protection Act (PHIPA, 2004). PHIPA designates the Information and Privacy Commissioner of Ontario (IPC) to provide oversight to ensure healthcare organizations are compliant with privacy legislation. You also have the right to contact the IPC for assistance in resolving privacy matters related to my private practice:

Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400, Toronto, Ontario, M4W 1A8
Tel: (416) 326-3333 or (800) 387-0073
Fax: (416) 325-9195
Web: www.ipc.on.ca