



DR. BRIANNA JARIS, C.PSYCH.

DEDICATED TO YOUR HEALTH AND WELL-BEING

Privacy Policy

Privacy of personal information is an important principle for me, Dr. Brianna R Jaris, C.Psych. I am committed to collecting, using, and disclosing personal information responsibly and only to the extent necessary for the goods and services I provide. I also try to be open and transparent as to how I handle personal information. This document describes my 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 I AM

At the time of writing, I am the sole proprietor of my business. I may use a number of consultants and agencies that may, in the course of their duties, have limited access to the personal information I hold. These include computer consultants, office security and maintenance, bookkeepers and accountants, temporary workers to cover holidays, credit card companies, website managers, cleaners, and lawyers. I restrict their access to any personal information I hold as much as is reasonably possible. I also have their assurance that they follow appropriate privacy principles.

I COLLECT 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 psychotherapy treatment. For example, I collect information about a client's health history, including their family history, physical condition and function, and social situation in order to help me assess what their health needs are, to advise them of their options, and then to provide the health care they choose to have. A second primary purpose is to obtain a baseline of health and social information so that in providing ongoing health services I can identify changes that occur over time. It would be rare for me 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 I believe the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from my client and I have no reason to believe that the message is not genuine).

About Members of the General Public

For members of the general public, my primary purposes for collecting personal information are to provide notice of special events (e.g., a seminar or conference) or to make them aware of psychotherapy services in general or my business in particular. For example, while I try to use work contact information where possible, I might collect home addresses, fax numbers, and email addresses. I try to obtain consent before using any such



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personal information, but where this is not, for any reason, possible, I will upon request immediately remove any personal information from my distribution list.

On my website, I only collect, with the exception of cookies, the personal information you provide and only use that information for the purpose you gave it to me (e.g., to respond to your email message, to register for a course, to subscribe to my newsletter). Cookies are only used to help you navigate my website and are not used to monitor you.

About Contract Staff, Volunteers, and Students

For people who are contracted to do work for me (e.g., temporary workers), my primary purpose for collecting personal information is to ensure I 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 I collect for those purposes include home addresses and telephone numbers. It is rare for me to collect such information without prior consent, but it might happen in the case of a health emergency (e.g., a SARS outbreak) or to investigate a possible breach of law (e.g., if a theft were to occur in the clinic). If contract staff, volunteers, or students wish a letter of reference or an evaluation, I will collect information about their work-related performance and provide a report as authorized by them.

I COLLECT PERSONAL INFORMATION: RELATED AND SECONDARY PURPOSES

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

- ❑ To invoice clients for goods or services that were not paid for at the time, to process credit card payments, or to collect unpaid accounts.
- ❑ To advise clients that their product or service should be reviewed (e.g., to ensure a product is still functioning properly and appropriate for their then-current needs and to consider modifications or replacement).
- ❑ To advise clients and others of special events or opportunities (e.g., a seminar, development of a new service, the arrival of a new product) that I have available.
- ❑ My business reviews client and other files for the purpose of ensuring that I provide high-quality services, including assessing the performance of my staff. In addition, external consultants (e.g., auditors, lawyers, practice consultants, voluntary accreditation programs) may on my behalf do audits and continuing quality improvement reviews of my business, including reviewing client files and interviewing my staff.
- ❑ Psychologists are regulated by the College of Psychologists of Ontario who may inspect my records and interview my staff as a part of their regulatory activities in the public interest. In addition, as professionals, I will report serious misconduct, incompetence, or incapacity of other practitioners, whether they belong to other organizations or my own. Also, my 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 my 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



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the authority to review my files and interview my staff as a part of their mandates. In these circumstances, I may consult with professionals (e.g., lawyers, accountants) who will investigate the matter and report back to me.

- ❑ 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 me to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.
- ❑ Clients or other individuals I deal with may have questions about my goods or services after they have been received. I also provide ongoing services for many of my clients over a period of months or years for which my previous records are helpful. I retain my client information for a minimum of ten years after the last contact to enable me to respond to those questions and provide these services (my regulatory College also requires me to retain my client records).
- ❑ If my business or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the organization’s records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of my accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization’s business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

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 in advance). I do not, however, have much choice about some of these related or secondary purposes (e.g., external regulation).

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 my 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 fulfill their duties and in accordance with my privacy policy.
- ❑ External consultants and agencies with access to personal information must enter into privacy agreements with me.



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RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

I need to retain personal information for some time to ensure that I can answer any questions you might have about the services provided and for my own accountability to external regulatory bodies. However, I do not want to keep personal information too long in order to protect your privacy.

I keep my client files for about ten years. My client and contact directories are much more difficult to systematically destroy, so I remove such information when I can if it does not appear that I will be contacting you again. However, if you ask, I will remove such contact information right away. I keep any personal information relating to my 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.

I destroy paper files containing personal information by shredding. I destroy electronic information by deleting it and, when the hardware is discarded, I ensure that the hard drive is physically destroyed. Alternatively, I may send some or all of the client files to my client.

YOU CAN LOOK AT YOUR INFORMATION

With only a few exceptions, you have the right to see what personal information I hold about you. Often all you have to do is ask. I can help you identify what records I might have about you. I will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). I will need to confirm your identity, if I do not know you, before providing you with this access. I reserve the right to charge a nominal fee for such requests.

If there is a problem I may ask you to put your request in writing. If I cannot give you access, I will tell you within 30 days if at all possible and tell you the reason, as best I can, as to why I 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 I may have formed. I may ask you to provide documentation that my files are wrong. Where I agree that I made a mistake, I will make the correction and notify anyone to whom I sent this information. If I do not agree that I have made a mistake, I will still agree to include in my file a brief statement from you on the point and I will forward that statement to anyone else who received the earlier information.

DO YOU HAVE A QUESTION?

Please contact me at:

Dr. Brianna Jaris, C.Psych.
343 Preston St., Suite 1168
Ottawa, ON K1S 1N4
(343) 291-1155 (T)
(855) 936-3301 (F)
info@drbrianna.com



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If you wish to make a formal complaint about my privacy practices, you may make it in writing to my Information Officer. He 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 my services or the mental or physical capacity of any of my professional staff, I would ask you to discuss those concerns with me. However, if I cannot satisfy your concerns, you are entitled to complain to my regulatory body:

COLLEGE OF PSYCHOLOGIST OF ONTARIO

110 Eglinton Avenue West, Suite 500, Toronto, Ontario M4R 1A3

Tel: (416) 961-8817

Fax: (416) 961-2635

opa@psych.on.ca

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

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