

G.S. Renfrey & Associates

Privacy & Confidentiality

Safeguarding the privacy of client personal information is a legal obligation for those providing psychological services. Dr. George S. Renfrey is committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services he provides, and ensures that the associates he supervises do likewise. This document describes how he and his associates handle personal information, and the practices used to ensure privacy and confidentiality.

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) which is not protected by privacy legislation.

Who We Are

At the time of this writing, Dr. Renfrey's clinical practice consists of himself, a number of highly qualified clinicians who provide services under his supervision, and a personal assistant. Occasionally, Dr. Renfrey will consult with a colleague (psychologist or psychiatrist) on a case but unless informed written permission is received by the client in question, no personally identifying information is revealed during such consults. In accordance with the requirements of the College of Psychologists of Ontario, Dr. Renfrey has identified Dr. Patrick Carney to take over responsibility for his records and current cases in the event of his death or incapacitation. In the event of a computer malfunction and the need to effect repairs, that repair agency may have temporary access to the hard-drive on which personal information is stored, but will not have access to passwords required to access it. As a rule, no other individuals or agencies have access to the personal information we hold.

The Primary Purpose Why Personal Information Is Collected:

About Clients...

Like all psychologists, Dr. Renfrey collects, uses, and discloses personal information in order to serve his clients. The primary purpose for collecting personal information is to provide professional services which include, coaching, consulting, counselling, psychotherapy, assessment, and crisis intervention. In the process, he may collect such information as relevant to a client's current and historic psychological, social, and occupations status. On occasion, tests and other assessment tools are employed to collect this information. It would be rare for him to collect such information without the client's express consent, but this might occur in an emergency (e.g., the client is in crisis or incapacitated) or where he believes the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from a client and he has no reason to believe that the message is not genuine).

Why Personal Information Is Collected: Related And Secondary Purposes:

Like most professionals, Dr. Renfrey also collects, uses, and discloses information for purposes related to or secondary to the provision of psychological services. The most common examples of these are::

- 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.

- Psychologists are regulated by the College of Psychologists of Ontario which can inspect psychological records and interview staff as a part of their regulatory activities in the public interest (Note: this is rare and only done after a complaint is made to the college).
- On rare occasions, as professionals, psychologists are obligated to report serious misconduct, incompetence, or incapacity of other regulated health care professionals. Sometimes these reports include personal information about clients, or other individuals, to support the concern (e.g., the identity of a client who reports abuse by another professional). The regulatory bodies that receive these reports, such as the College of Physicians and Surgeons, have their own strict privacy obligations.
- In rare circumstances, several government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review a psychologist's files and interview staff as a part of their mandates. In a such cases, all effort is made to minimize exposure to private information.
- The cost of services of Dr. Renfrey and his associates are sometimes paid for by third parties (e.g., Health Canada, Veteran's Affairs, WSIB, private insurance). These third-party payers often have your expressed / implied consent or legislative authority to request non-medical information about clients (e.g., confirmation of appointment dates and costs) in order to confirm client entitlements.
- The clients of psychologists may have questions about the services they received, sometimes years later. In addition, it is common for clients to return to a psychologist for further work on an issue or a new issue, or they seek the services of another provider. In those cases, access to client records is valuable.

Protecting Personal Information

The following are the steps taken by Dr. Renfrey and his associates to protect personal information:

- Paper records are either under supervision or secured in a locked or restricted area at all times.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers and are equipped with virus and malware protection.
- Paper information is transmitted through sealed, addressed envelopes.
- Electronic information is transmitted either through a direct line (e.g., fax), or has personal 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.

Retention And Destruction Of Personal Information

- Psychologists in Ontario typically retain client records for twelve years after the last contact, as mandated by the College of Psychologists.
- Dr. Renfrey and his associates destroy paper files containing personal information by shredding.
- Dr. Renfrey and his associates destroy electronic information by deleting it and, when hardware is discarded, we ensure that the hard drive is physically destroyed.

You Can Look At Your Information

With only a few exceptions, you have the right to see what personal information Dr. Renfrey and his associates hold about you. Often all you have to do is ask. Psychologists and their associate are obligated to try to ensure that clients do not misinterpret information in their file so it is customary to answer questions about anything you do not understand. In some cases you may be required to show proof of identity before providing you with access (e.g., a request that comes by letter). Fees for access are expected to be reasonable, and only reflect the cost in time and materials to the psychologist.

In the rare event that Dr Renfrey believes it is not in your best interest to have open access to your file, he may ask you to put your request in writing. If he can justify denying access, he will tell you within 30

days if at all possible and tell you the reason, as best he can, as to why he cannot give you access. If you do not agree to this, you can contact the College of Psychologists of Ontario, which can investigate the matter and intervene if warranted.

If you believe there is a mistake in the information contained in your file, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions he or his associates may have formed. He may ask you to provide some documentation to support the claim that the information in the files is erroneous. Where he agrees that the information is wrong, he will make the correction and notify anyone to whom he sent this information (e.g., an insurance company). If he does not believe the information is wrong, he will agree to include in his file a brief statement from you on the point in question and will forward that statement to anyone else who received the earlier information.

Limits to Confidentiality

Your confidentiality is respected and protected at all times. No information will be communicated, directly or indirectly, to a third party without your informed and written consent. Exceptions to confidentiality include the legal and/or ethical obligations to:

- Inform a potential victim of violence of a client's intention to harm
- Inform an appropriate family member, health care professional, or police if necessary of a client's intention to end his or her life
- Release a client's file if there is a court order to do so
- Inform the Children's Aid Society if there is suspicion of a child being at risk of, or in need of, protection due to neglect, or physical, sexual, or emotional abuse
- Report child pornography
- Report elder abuse in long term care facilities

Do You Have A Question?

Any questions about this form or your file should be directed to Dr. Renfrey himself. He can be reached at:

Mail: 49 Seymour Crescent
Barrie ON L4N 8N4
Phone: 705-735-6084 / -6085 (fax)
Email: g.s.renfrey@hotmail.com

Dr. Renfrey will make every reasonable effort to answer any questions or concerns you might have.

If you wish to make a formal complaint about the privacy practices of Dr. Renfrey or a supervised associate you are receiving service from, you should make it in writing to him directly. He will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a written report of his findings and any actions taken. If you are not satisfied with this, you can then take the matter up with the College of Psychologists. In the event that you are receiving services from a supervised associate, you should also report your concerns to his or her regulatory body (e.g., The College of Registered Psychotherapists).

Similarly, if you have any concerns about the professionalism or competence of Dr. Renfrey or an associate you may be working with, your first step would be to address this with him directly. However, if he cannot satisfy your concerns, you are entitled to complain to the College of Psychologists. If you are receiving services from a supervised associate, you should also report your concerns to his or her regulatory body (e.g., The College of Registered Psychotherapists).

G. S. Renfrey, Ph.D., C.Psych - Privacy Policy

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375 University Avenue, Suite 803
Toronto ON M5G 2J5
1-844-712-1364 / 416-639-2168 fax
www.crpo.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:

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