

MILLS PSYCHOLOGY PROFESSIONAL CORPORATION
PSYCHOLOGICAL, COUNSELLING, ASSESSMENT, EDUCATIONAL, & VOCATIONAL SERVICES
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JON MILLS, Psy.D., Ph.D., C.Psych., ABPP
Director

Mills Psychology Privacy Policy

Because your privacy protection is a priority for us, Mills Psychology & Associates are in full compliance with the Personal Health Information Protection Act (PHIPA) and the Personal Information Protection & Electronic Documents Act (PIPEDA). We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. This document describes our privacy policies.

No personal information will be communicated, directly or indirectly, to a third party without your informed and/or written consent.

We retain personal information to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies, such as the College of Psychologists of Ontario. Records are maintained and stored, then disposed of after a mandatory period of time in order to protect your privacy.

What is Personal Information?

Personal information refers to information about an identifiable individual and includes information that relates to an individual's personal characteristics (e.g., name, date of birth, home address and telephone number), their health (e.g., presenting problem, health services provided to the individual), as well as other private matters. Personal information is not the same as business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

We use a number of consultants and agencies that may, in the course of their duties, have limited access to the personal information we hold. These consultants and agencies for the most part include (but are not limited to) our administrative and clinical staff, bookkeepers and accountants, lawyers, credit card companies, and financial institutions. We restrict their access to any personal information we hold as much as reasonably possible. We also have a legal confidentiality agreement with all parties working with Mills Psychology.

Use and Disclosure of Personal Information

No personal information will be communicated, directly or indirectly, to a third party without your informed and written consent. Rare exceptions to this policy include the legal and/or ethical obligations stipulated by law. Mills Psychology is regulated by the College of Psychologists of Ontario who may inspect our records as part of their regulatory activities in the best interest of public protection. External regulators have their own strict privacy obligations.

Like all organizations, various governmental agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files as 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 our practice to clients is paid for by third parties (e.g., WSIB, private insurance, motor vehicle insurance, EAP Companies, etc). 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.

It is the policy of Mills Psychology that clients have a legal and moral right to know what information is contained about them in their record. Clients or their legal designates shall have access to all information which can be identified as pertaining to them (and only them) and which is stored in the client record, with the exception of information that is believed to be harmful, prohibited by the College of Psychologists, or that is confidential about or from third parties. We will need to confirm your identity and legal right to have access to the information. We also reserve the right to charge a nominal administrative fee for such requests.

Dr. Mills has published professional articles in leading peer reviewed Canadian psychology journals about the dangers of maintaining detailed clinical session notes on patients in their file. For this reason, very minimal session notes are kept on the patient in order to protect them from third party exploitation. Clinical notes are not considered to be part of the patient's file or formal clinical record and are not subject to review by insurers or third parties, including the patient. Clinical notes are the private and confidential thoughts of the clinician and remain their intellectual property. They do not conform to the professional requirements concerning appropriate record keeping and are therefore expunged from the file. Process notes are privileged access material and subject to the same constraints as raw test data, which is not to be distributed based on College sanctions. With appropriate consent, third parties are entitled to review formal assessment reports, progress notes, and discharge notes, which are part of the file. Clinical notes are destroyed once these professional documents become part of the file in order to protect the patient from exploitation from third parties who may misinterpret or distort the notes to suit their own benefits dislocated from the context of our helping relationship with the patient. It may also be harmful for patients to read field notes in their raw form, which may damage the treatment or professional relationship. Insurers and lawyers have no right to view these personal documents short of a court order.

In the event you or a third party on your behalf wants a copy of your file, we may ask you to put your request in writing and provide consent. If we cannot give access to your record, we will provide an explanation within 30 days.

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. If changed, a statement of changed information is included in the record. If the request for a change is declined, the client may file a notice of disagreement in the record.

Protecting Personal Information

We uphold the primacy of protecting your personal information. For that reason, we have taken the following steps:

- * Paper information is stored 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.
- * Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies (e.g., Canada Post).
- * Electronic information is transmitted through a secure server.
- * Any files being transported are required to be stored in a secured area.
- * Mental health practitioners and 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

As required by our external regulatory bodies, we retain personal information for 10 years following the client's last contact or, if the client was less than 18 years of age at the time of last contact, for 10 years following the day the client would have turned 18.

To safeguard your privacy, we destroy all paper files containing personal information. We destroy electronic information by deleting it and when the hardware is discarded, we ensure the hard drive is physically destroyed.