



# Privacy, Confidentiality & Data Protection Policy

## *Who we are*

Our website address is: <https://cpyc.ca>.

## *What personal data we collect and why we collect it*

Clients have an online account created in our bookings system called “MY ACCOUNT” that is hosted by a service called “Jane” (<https://jane.app/>). Clients can manage their account through CPYC online booking service, including booking, rescheduling and canceling appointments, making payments and keeping their personal details up to date. Personal data we hold includes:

- Address
- Telephone numbers
- Email address
- Emergency contact
- Family doctor
- Date of birth
- Gender and sex
- Employer
- Occupation
- Active credit card details
- For parents - custody status
- Relevant relationships to clients (e.g. parents to children, spouse etc)
- Intake forms

## *Intake Forms*

All CPYC new clients must complete intake forms as part of the online booking process for psychotherapy, yoga therapy and yoga classes. The intake form is an important document as it is designed to provide the client with informed consent around CPYC policies with completion and signing of the form signaling that clients agree to abide by the policies. These include:

- Accuracy of information provided
- Privacy and sharing of personal information
- Cancellation policy
- Informed consent and service agreement
- Confidentiality
- Consent to treatment

- Fees policy consent
- Parental/Guardian Consent for children under the age of 13 years old
- Signature
- Yoga class and yoga therapy disclaimer/waiver/release

Please see our **Booking Policy** for further details on the cancellation policy.

### International Clients

Clients who are seeking therapy and are non-residents of Canada must complete the “Contract for International Clients” form.

### ***Linking Client Accounts***

There are times when client My Accounts are “linked” via “relationships”. This is usually because clients are in therapy together (e.g. couples therapy, family therapy, children in therapy). When we link client accounts we are doing this through “relationships” the client has with one another. We then set up various permissions that clients can receive for each other’s “My Account”. Clients must provide consent to have these permissions set on their account, and these can be changed at any time, these include:

- View and pay
- Manage bookings and intake forms
- Receive copies of receipts, statements and financial emails
- See appointments in calendar subscriptions

### ***Confidentiality***

As part of the Psychotherapy and Yoga Therapy processes, the Psychotherapists and Yoga Therapists at CPYC are bound by ethical responsibilities, college requirements (CRPO, OCSWSSW and IAYT) and PHIPPA to keep confidential the information shared during the sessions. In general, we will not release any information without clients' written permission.

There are important exceptions to the confidentiality of the Psychotherapy and Yoga Therapy relationship.

- All Psychotherapists and Yoga Therapists are required by law to reveal certain information under the following circumstances:
- Client’s disclosure of serious intent to do harm to self or others.
- Client’s disclosure of child abuse or our serious suspicion of child abuse, elder abuse, or dependent adult abuse.
- If a court of law orders the release of specific information.

The Psychotherapists and Yoga Therapists at CPYC must obtain an individual’s authorization to use or disclose psychotherapy notes with the following exceptions:

- The Psychotherapist who originated the notes may use them for treatment. This includes consulting with other health and mental health professionals about a case.
- During consultations, Psychotherapists and Yoga Therapists make every effort to avoid revealing the identity of clients. The other professionals are also legally bound to keep the information confidential.
- The Psychotherapists and Yoga Therapists at CPYC may use for educational purposes, without an individual’s authorization, the psychotherapy notes, in training situations where names and identifying information are changed for the protection of the client.
- Psychotherapists and Yoga Therapists at CPYC regularly consult with each other in a group format to maintain the high standard of care we set for all of our therapists. At

these “in house” case consultations, we will collaborate on your case within the therapy team and confidentiality will remain within the therapy team.

- Additionally, the Psychotherapists and Yoga Therapists at CPYC may use and disclose the psychotherapy notes to defend themselves in legal proceedings or other complaints brought by the client.
- The Office Manager may see confidential information in client files at times. They are bound by a confidentiality agreement, and we will take any unnecessary breaches of confidentiality seriously.
- Our accountants will be able to see the client's name, address and billing information. They will not have access to client's case notes. They are also bound by confidentiality agreements, and we will take any unnecessary breaches of confidentiality seriously.

## ***Data Protection***

Our website privacy policy can be found on our website page under [Privacy Policy](#).

Our associated websites (e.g. Jane app) may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website. See Jane's [privacy policy](#).

We utilize Google Workspace and Gmail. To see how Google protects your privacy and security please see the information provided on their [website](#).

## ***How long we retain your data***

Retention of records. Client files are kept in accordance with CMPA (Canadian Medical Protective Association <https://www.cmpa-acpm.ca/en/advice-publications/browse-articles/2003/a-matter-of-records-retention-and-transfer-of-clinical-records> ) and are retained as follows, adults (18 and older) 10 years past the date of the last entry in the client record, children (18 and under), 10 years from the date of record until they reach adult age (18).

## ***What rights you have over your data***

You have the right to request to see your client file.

## ***How we protect your data***

CPYC adheres to PHIPA (Personal Health Information Protection Act), OCSWSSW (Ontario College of Social Workers and Social Service Workers), CRPO (College Registered Psychotherapists of Ontario), IAYT (International Association of Yoga Therapists) requirements through:

- Keeping records secure. Client files are created, managed and maintained through the secure online booking system (Jane). Jane is compliant with PHIPA regarding security of electronic data (<https://jane.app/guide/basics/security-faq>). CPYC does not create paper client files, but may take client notes which are held in a secure locked cabinet.
- CPYC shreds all notes, messages, jottings at their offices and these are destroyed via recycle waste.

## ***What data breach procedures we have in place***

If CPYC or a client suspects or confirms a privacy breach, either party can raise the concern. Clients can call the Office Manager on 705 300 2329 extension 0. CPYC will inform clients of the suspected or confirmed breach and provide what information they suspect/or confirmed to have been shared. CPYC or the client can contact the Privacy Commission of Ontario if further advice or guidance is required ([info@ipc.on.ca](mailto:info@ipc.on.ca)). CPYC can also reach out to Professional Practice advisors for their respective professional organisations.

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