



Privacy and Confidentiality

POLICY:

Thrive Counselling is a family service organization that provides a variety of counselling services and programs to the residents of Halton. Thrive is committed to keeping your personal information accurate, confidential, secure and private. When you visit our website, contact us, participate in our services or make a donation to support our activities, we are committed to protecting your privacy rights and your personal information.

Thrive's privacy policy is based upon accreditation standards for the Protection of Personal Information and reflects the requirements of applicable legislation including the Freedom of Information and Protection of Privacy Act (FIPPA).

This privacy policy describes the principles that Thrive will use to protect the privacy of your personal information in its possession. It addresses the reasons why such information is collected, how it is used, how it is confidentially protected and outlines your rights with respect to this information.

This privacy policy is applicable to our clients, community partners, donors, board members, students, volunteers and employees.

Personal information is defined as any factual or subjective information, recorded or not, about an identifiable individual. Examples are age, name, source of income, home addresses and telephone numbers. Personal information does not include the name, title, or business address or telephone number of an employee of an organization.

Thrive's Privacy Principles

1. Accountability

Thrive is responsible for the protection of your personal information collected through our offices, services and website. Individuals will be asked to review and sign a consent form before any personal information is released to third parties for the purpose of providing enhanced services or otherwise. Consent may be given by an individual's authorized representative (such as a legal guardian or a person having a power of attorney).



Thrive Counselling's Executive Director is designated as Thrive's Privacy Officer, and has overall responsibility for the protection of personal information and for Thrive's compliance with this privacy policy.

Chondrena Vieira-Martin, Executive Director, Privacy Officer
Thrive Counselling, 235 Lakeshore Rd E. Oakville, Ontario, L6J 1H7
(905) 845-3811
cmartin@thrivecounselling.org

2. Identifying Purposes

Thrive will provide an explanation of the purpose(s) for the collection of your personal information wherever possible, before we ask you to disclose it.

We collect personal data when you make use of or register for our programs and services, in order to better meet your program, service and information needs.

We also use and disclose data, which does not identify individuals, for statistical purposes to assess, develop and improve Thrive's programs and services.

We also collect personal information in order to refer you to enhanced services, or to satisfy legal, government and regulatory obligations.

We will not disclose your personal information to anyone else without your prior knowledge or consent, except when required by a government body or agency, or as permitted by law.

We may contact you to ask you for feedback about the services you have already received as part of our quality assurance commitment and you may decline to be contacted.



Thrive's Website and Use of Cookies

A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer so that the website may identify separate visitors to the site and track users' activities on the website. A cookie will not let a website know any personally identifiable information about you, such as your real name and address.

Thrive uses cookies only to keep track of how many people visit Thrive's website and how frequently each page is visited. Each individual movement of any user cannot be tracked while on Thrive's site. Cookies are only used to track page popularity for statistical purposes and to improve the quality of the site and meet your needs (for more information on cookies, please check your browser's settings).

Links on our Website

As Thrive wants your website experience to be informational and resourceful, our website also provides a number of links to third party sites. Thrive assumes no responsibility for the information practices of sites you are able to access through our site. We encourage you to review each site's privacy policy before disclosing any personally identifiable information.

3. Consent & Disclosure

You can choose not to disclose any personal information we may ask you to provide. However, a decision to withhold some personal information can result in our inability to provide you with our services.

Further, you can withdraw your consent to the collection, use or disclosure of your personal information at any time, subject to any legal requirements and reasonable notice.

4. Limiting Collection

The amount and type of information that Thrive collects is limited only to that which is necessary to fulfill the purposes identified. Personal information will be collected using procedures which are fair, transparent and lawful.



5. Limiting Use, Disclosure and Retention

Thrive will use your personal information only for the purposes for which it was collected.

Your information will not be disclosed without your knowledge and consent, unless permitted or required by law.

Statutory exceptions to confidentiality:

- If a child under the age of 16 years is in need of protection from physical or sexual abuse, serious emotional abuse or neglect, then, the staff person, student or volunteer must report this information to the Children's Aid Society.
- If a judge orders the release of information during a legal proceeding, Thrive may be forced to release files and staff may be subpoenaed to testify.
- If a client reveals abuse by a regulated health professional, this must be reported, first to their immediate supervisor or designate, then to the appropriate regulatory body.

Thrive's policy exceptions to confidentiality:

- Situations in which the client is at risk to physically harm self or others.
- Client information may be shared within Thrive during supervision, clinical meetings or consultations with other staff members as part of the service planning and review of the counselling work with clients.
- Accreditors including the Canadian Centre for Accreditation, the OACCS, funders, and auditors, during accreditation or reviews of Thrive's work, may read client records. These professionals are bound by principles of confidentiality. Clients may decline this review during the orientation process.
- Thrive's staff uses client and/or clinical materials in teaching, writing, consulting, research and public presentations ONLY if a written waiver has been obtained, or when appropriate steps have been taken to protect client identity and confidentiality.
- When the ethical code of a professional organization to which an employee belongs demands a more stringent practice or is in conflict with this policy, the employee will consult with his/her supervisor about how to proceed.

Your personal information will be retained as long as necessary to fulfill the purposes for which it was collected, and in compliance with any laws surrounding information retention.



6. Accuracy and Updating

In order to ensure the reliable delivery of services and information, your personal information will be kept accurate, complete and up to date.

We assume that the information that you provide to us is accurate. If at any time your personal information changes, we hope to be informed of it immediately. If you contact us with a request, we will take appropriate steps to update or correct the personal information in our possession that you have previously provided to us.

7. Safeguards

Thrive employs a number of safeguards to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Agency safeguards include locked filing cabinets, restricted access to offices, limiting access on a “need to know” basis, the use of passwords and encryption, and procedures for tracking when records are transported.

In the event the agency discovers that personal information in its custody or under its control has been stolen, lost or accessed by an unauthorized person, it will notify the affected individual at the first reasonable opportunity.

Procedures for implementing these measures are communicated to all employees to ensure compliance with this principle.

8. Openness

Thrive has easily understandable and readily available specific information about its policies relating to the management of personal information. Our policy is available at all times on the Thrive’s website www.thrivecounselling.org

9. Access and Correcting of Personal Information

Upon request, we will inform you if we hold any personal information about you and provide you with access to this information. If we have any personal information about you, we will also tell you for what purposes it is used, if applicable.



An individual who wishes to review or verify what personal information is held by the agency, or to whom the information has been disclosed (as permitted by law), may make the request for access to the Privacy Officer. Upon verification of the individual's identity, the Privacy Officer will respond within 30 days in writing. Thrive will provide access to personal information at no cost. If the individual finds that the information held by the agency is inaccurate or incomplete, the agency will make the required changes to the individual's active file(s) promptly, upon the individual providing documentary evidence to verify the correct information

10. Challenging Compliance

If, for any reason, you are concerned about our compliance with our privacy policy, you may contact our Privacy Officer in writing, by phone or by email:

Chondrena Vieira-Martin, Executive Director, Privacy Officer
Thrive Counselling, 235 Lakeshore Rd E. Oakville Ontario L6J 1H7
905-845-3811

cmartin@thrivecounselling.org

Thrive has policies and procedures to receive, investigate and respond to individuals' complaints and questions and you will be contacted with a response within five (5) business days of a complaint or question to the Privacy Officer.

This privacy policy may be updated from time to time. Notice of changes to this privacy policy that affect you will be posted at the agency's website.