

## **Privacy Policy of the**

### **Canadian Register of Health Service Providers in Psychology**

#### General Information

The Canadian Register of Health Service Providers in Psychology (CRHSPP) is a national credentialing body. It credentials health service psychologists who meet its eligibility criteria. A primary objective is to facilitate public and third party identification and access to qualified health service psychologists. It does so in part through the publication of a Directory. Currently, there is a hard copy annual Directory and an electronic online searchable Directory. At a future time, this information may also be published via a CD-ROM or similar medium.

Subject to the provisions described below (in the sections “What is Personal Information?” and “How Is Information Collected?”) regarding public access to information in the Directory, CRHSPP is committed to maintaining high standards of confidentiality with respect to the Personal Information provided to us. This Policy Statement has been prepared to affirm our practice of maintaining the privacy of our Registrants and others as well as to inform you of our practices concerning the collection, use and disclosure of Personal Information and information about Registrants provided to CRHSPP.

For purposes of this policy, “Registrant” means an individual psychologist who has been admitted to the Register or who seeks admission to the Register.

Our obligations apply to all Officers, Board members, Executive Committee members, Admissions Committee members, Web Master, employees, contractors and agents who provide services to or on behalf of CRHSPP related to our products and services.

If you have questions about (i) access to your Personal Information; (ii) our collection, use, management, or disclosure of Personal Information; or (iii) this Policy, please contact the Executive Director at [info@crhspp.ca](mailto:info@crhspp.ca), 368 Dalhousie St, Suite 300, Ottawa, ON K1N 7G3. Tel: 613 562 0900; Fax: 613 562 0902. The Executive Director serves as CRHSPP’s Privacy Officer.

#### What is Personal Information?

We consider “Personal Information” to mean any information, recorded in any form, about an identified individual or an individual whose identity may be inferred or determined from such information, other than information provided by Registrants for publication in the Directory.

#### How is Information collected?

At the time of admission and annually thereafter, Registrants complete a “Registrant Information Questionnaire” (RIQ). The completed RIQ provides information on the Registrant’s highest academic degree in Psychology, Licensure with provincial / territorial regulatory bodies of Psychology, areas of practice and practice related supplementary information. This information is published in the Directory unless the Registrant has requested that only their name be listed in the Directory (see below for how this occurs).

The RIQ also provides the Registrant's preferred mailing address, home address and telephone number, and the civil address, telephone and fax numbers, email address and web site for each distinct practice setting the Registrant requests be listed in the Directory. Home address and telephone number are considered "Personal Information" and are not listed in the Directory unless the Registrant has so requested by virtue of this also being a practice setting to be included in the Directory.

Purely demographic information (e.g., age, gender) is not published and is considered "Personal Information". It may be used as aggregate data.

As part of the eligibility review and admissions process, each regulatory body of psychology with which the Registrant has licensure is contacted to verify their status in the particular jurisdiction. Once admission has been attained, regulatory bodies are asked to annually verify that Registrants from their jurisdiction continue to hold licensure that enable them to practice Psychology autonomously.

#### How May Registrants Limit the Information collected by the RIQ?

Any Registrant may request that only their name be published in the Directory. Such requests apply to all media in which the Directory is published. The RIQ provides for this option.

Registrants may also request a voluntary interruption of their listing in the Directory for a period not to exceed three years. Such a request should be submitted to the Executive Director.

#### Why CRHSPP Collects Personal Information

CRHSPP collects various information, including Personal Information, provided in writing (including electronic means) or verbally about Registrants to fulfill its objectives and purposes. This includes:

Developing statistical and equivalent profiles to

- assist Health Human Resource planning with the federal, provincial and territorial governments or with other professional bodies of Psychology and other health professions.
- assist its own recruitment and retention activities and otherwise manage our relationship with Registrants.
- communicate with and determine the needs of its Registrants.
- meet any legal or regulatory requirement. In particular, CRHSPP responds to inquiries from regulatory bodies wishing to verify that information about a Registrant's practice as stated in the Directory was provided to CRHSPP by the Registrant.

CRHSPP permits suppliers whose products and services have been deemed by CRHSPP to be pertinent to health service psychologists. This includes providing for a fee Registrants' published addresses.

CRHSPP facilitates or participates in research that will advance health care and Psychology. Personal Information is only provided in this context on an aggregate basis. Registrants may also be asked to participate in research activities. This may include providing Registrants' published addresses to

external researchers whose scientific work has deemed pertinent to CRHSPP's objectives and purposes.

#### How May Registrants Prevent Their Name and Published Addresses From Being Communicated to Suppliers and External Researchers?

At any time, a Registrant may request the Executive Director to delete their name and published addresses from any set of Registrants' names and addresses provided to suppliers and external researchers. At the time of payment of the annual renewal fee and submission of the annual RIQ, Registrants are reminded that they make such a request.

#### How CRHSPP Uses Personal Information

CRHSPP only collects, uses and discloses Personal Information for purposes that would be considered reasonable in the circumstances. We use only fair and lawful methods to collect Personal Information. Our use of Personal Information is limited to the purposes described in this Policy.

#### When CRHSPP May Disclose Your Personal Information

As a general rule, all Personal Information concerning a Registrant is held in confidence. Except in limited circumstances, it is not revealed to anyone unless expressly or implicitly authorized by the Registrant. As noted above, CRHSPP does lease the published name and address to approved suppliers and this may also be provided to approved researchers.

Where CRHSPP discloses Personal Information to organizations that perform services on its behalf, we will require those service providers to use such information solely for the purposes of providing services to the person concerned or CRHSPP and to have appropriate safeguards for the protection of Personal Information.

It should be noted that there are circumstances where the use and / or disclosure of Personal Information may be justified or permitted or where CRHSPP is obliged to disclose information *without consent*. These circumstances may include:

- Where required by law or by order or requirement of a court, administrative agency, or other governmental tribunal;
- Where CRHSPP believes, on reasonable grounds, that it is necessary to protect the rights, privacy, safety, or property of an identifiable person or group;
- Where it is necessary to establish or collect fees;
- Where it is necessary to permit CRHSPP to pursue available remedies or limit any damages that CRHSPP may sustain;
- Where the information is public.

When obliged or permitted to disclose information without consent, CRHSPP will not disclose more information than is required.

#### Consent

Unless permitted by law, no Personal Information is collected or disclosed without first obtaining the

consent of the Registrant or other individual concerned. However, we may seek consent to use and disclose Personal Information after it has been collected in those instances where CRHSPP wishes to use the information for a purpose not identified in this Policy, or not previously identified, or for which the Registrant or other individual has not previously consented.

The procedure by which a Registrant may withdraw their consent to have their published name and addresses provided to suppliers and external researchers is described above. Other individuals may withdraw their consent to disclosure of Personal Information by communicating such a request to the Executive Director. However, CRHSPP shall be deemed to have acted in good faith and incur no liability when Personal Information has been disclosed with consent prior to the subsequent withdrawal of such consent.

#### Accuracy and Retention of Personal Information

CRHSPP seeks to ensure that Personal Information provided by Registrants and maintained in its data base is accurate and current as well as complete for the purposes for which it uses the information. It corrects errors or changes in information that are brought to its attention.

The complete records of former Registrants are retained. However, no attempt is made to update these records. They are retained only for archival purposes and to facilitate requests for re-admission. They may be used for historical research. In this instance, Personal Information is only analysed or reported on an aggregate basis.

CRHSPP currently holds all records including Personal Information and all other information about Registrants in its Head Office in the City of Ottawa. These records are held in a combination of hard copy files and an electronic data base.

#### Protection of Personal Information

CRHSPP endeavours to maintain appropriate physical, procedural and technical security of its office and information storage to prevent loss, misuse, unauthorized access, disclosure, or modification of Personal Information. Access is limited to employees, contractors and agents that the management of CRHSPP has determined need to know the information in order to provide our products, services and information. Employees, contractors and agents are expected to abide by this Privacy Policy. Breaches of this Policy are considered to be a serious matter for which appropriate action may be taken including but not limited to termination of employment, contract or other form of relationship with CRHSPP. We review our procedures and security measures periodically to ensure that they remain effective and appropriate.

#### Access to Your Published Information and to Your Personal Information

Published information may be reviewed at any time. All Registrants are provided a copy of the annual Directory; this is currently a hard copy version; at a future date, this may be a CD-ROM or equivalent version. It may also be found by consulting the online version via the CRHSPP web site at [www.crhspp.ca](http://www.crhspp.ca) .

CRHSPP permits the reasonable right of access and review of non-published Personal Information held by CRHSPP about a Registrant. It will seek to provide the information in question within a reasonable time, usually no later than 30 days following receipt of the request. Where information will not or cannot be disclosed, the Registrant will be provided with the reasons for the non-disclosure. Requests for access or questions about this aspect of the policy and procedures should be addressed to the Executive Director.

#### CRHSPP's Web Site and Electronic Communications

A visitor to the CRHSPP web site is not required to provide individually identifiable information, nor is such information collected by passive means. In order to access and use Registrant-only components of the site, Registrants may need to provide certain Personal Information. This is only used to provide information and services to Registrants.

Information is collected when an individual completes an on-line survey or an on-line application for admission. The information is collected, used and disclosed in a manner consistent with this Policy Statement.

Our Web Master collects visitor information in the form of the visitor's domain, time of day and week, and which pages are being accessed. This information is analysed and retained only on an aggregate basis. No individual information on these data are retained. This information is used internally to assist us to improve the Web Site, diagnose and correct technical problems, as well as to better serve the public, third parties and Registrants.

CRHSPP periodically communicates via email to those Registrants who have provided a currently valid email address. This occurs typically by dissemination of the electronic version of its newsletter (*Rapport*), through the direct provision of educational information to enhance the professional competence of Registrants, through announcements of certain services and products (e.g. dates and location of workshops, availability of practice enhancement products), and through invitations to participate in surveys (e.g. to assist CRHSPP in its strategic planning).

#### Products and Services

Registrants and third parties may need to provide Personal Information when purchasing products and services provided by CRHSPP or by CRHSPP and its partners. This may include:

- Corporate identification information
- Personal identification information
- Financial Information (e.g., purchase order numbers or any other payment information for billing purposes)
- Delivery information

This information is held by CRHSPP only for internal purposes.

Consumers of CRHSPP products and services may request the information held about them in connection with their purchases of such products and services. It would only be disclosed if required

to do so by pertinent provisions found in this Policy above (section on “When CRHSPP May Disclose Your Personal Information”). Requests to access by consumers of CRHSPP products and services will be treated similarly to requests identified above (section on “Access to Your Published Information and to Your Personal Information”) and should be submitted to the Executive Director.

CRHSPP does not provide products and services to the public other than the information provided in its Directory and on its Web Site.

#### Review and Revision Of This Policy

This statement is in effect as of January 24, 2005 following approval by Council on January 23, 2005. It is intended to comply with the ‘Personal Information and Protection of Electronic Documents Act’ (PIPEDA) of the Government of Canada. It will be reviewed from time to time and revised as may be indicated to reflect evolving privacy practices, and / or changes in legislation, and / or judicial decisions on matters related to PIPEDA or privacy practices, and / or CRHSPP’s desire to enhance its services to the public, third parties and Registrants. Should revisions occur, a notice will be posted on the CRHSPP web site and published in appropriate CRHSPP publications.