

Privacy

Principle 1 Accountability

Resolve Counselling Services Canada is responsible for personal client information in its custody and control.

The Executive Director is appointed as the Privacy Officer for Resolve.

Principle 2 Identifying Purposes

Resolve collects basic information such as name, address, telephone numbers, birthdate and marital status. In addition, Resolve may collect information relating to a client's employment history, personal health care history, financial history including credit and past payment records, educational history.

Resolve collects and uses this information to assess the personal, emotional or financial needs of the client in order to provide the appropriate counselling, advice or advocacy and/or to develop service plans. Purposes of counselling are outlined in the individual program philosophy & objectives¹.

Resolve also uses the aggregate demographic information from the personal information collected to identify services and programs that may benefit the communities Resolve serves; to target Resolve's marketing and awareness programs; and to maintain the ongoing financial support and cooperation of Resolve's financial stakeholders. No individual can be identified through this information.

Principle 3 Consent

Resolve will not collect, use or disclose a client's personal information without the express consent of the client, except in cases where mandated by law².

Principle 4 Limiting Collection

Resolve personnel collect personal information about individuals only when the individual is a client or potential client of the agency.

Resolve will not collect, use or disclose a client's personal information for any purpose other than what has already been identified to the client and agreed to by written consent.

¹ Refer to Resolve program philosophies & objectives.

² Refer to Resolve's confidentiality policy, legal consent policy, child abuse reporting policy and intent to harm policy.

Principle 5 Limiting Access, Use, Disclosure and Retention

Resolve will only use personal information within the boundaries already predetermined by the agency and client. New purposes require new consent.

Resolve will retain all counselling files for a minimum of 10 (ten) years after the case is closed. Records for a client under the age of 18 will be retained for a minimum of 10 (ten) years after their 18th birthday. After that time, all applicable files are destroyed³.

Resolve recognizes the 'need to know' policy as a guideline for who accesses client files. It guarantees that only employees who need to access clinical or donor information are able to access this information. Employees who do not have any reason to access client records do not have access to clinical data bases. Clinicians, supervisors, managers and appropriate Directors can access client files for purposes of service provision, supervision and file audits. Secretaries and other administrative support do not have access to file content unless with the express permission of the relevant program director.

Principle 6 Accuracy

During the course of service, Resolve ensures, to the best of its ability, that the client information it holds is accurate, complete, current and relevant to the identified purposes.

Principle 7 Safeguards

Resolve ensures that personal information is protected appropriately⁴.

All Resolve personnel and third party affiliates sign a confidentiality waiver agreeing to be bound to the policies of the agency. It is a breach of ethics for any Resolve employee not involved in the service to a client to access the client file. Client files are kept in locked filing cabinets or storage areas. Electronic client files are protected by individual employee passwords.

Principle 8 Openness

Resolve communicates its privacy policy to clients by means of a handout. A privacy statement is available on the Agency's website.

Principle 9 Individual Access

Resolve acknowledges that clients have a right to access their files⁵ for the purpose of

³ Refer to Resolve's retention & destruction of records policy.

⁴ Refer to Resolve's security of records policy.

⁵ Refer to Resolve's client's right to access records policy, legal consent policy, and copy of client records policy.

checking the accuracy of personal information. Clients can make this request through their individual counsellor. The counsellor or appropriate Manager, Clinical Program Director or Executive Director will review the records with the client and identify any discrepancy.

Adjustments may be made in cross-reference to the original material previously noted on the file.

Principle 10 Challenging Compliance

Resolve acknowledges that clients have a right to challenge the agency's compliance with its own privacy policy and related procedures.

Individuals may submit a complaint in writing to the Resolve Privacy Officer or designate. The Privacy Officer or designate will investigate the complaint and respond to the individual.

If Resolve identifies that there is a lack of compliance, the Privacy Officer will work with the appropriate Manager or Clinical Program Director to contact the affected client(s) and advise them.

Principle 11 Privacy Officer

The Privacy Officer ensures that Resolve employees, Board of Directors and policies conform to the various legislations designed to protect client and donor information.