

Privacy at KW Counselling Services

KW Counselling Services (KWCS) recognizes the sensitivity of personal information and is committed to protecting the privacy and personal information of its clients, board members, staff, interns, volunteers, donors, and other stakeholders as required by provincial and federal privacy legislation.

Collection of Personal Information

KWCS collects personal information only as required for specific purposes and the use of that personal information is limited to the purposes for which the information was provided.

Use of Personal Information

KWCS generally uses personal information for the following purposes:

- Providing services or information to clients, prospective clients and community members
- Providing information to third parties for which clients have consented
- Contacting clients to evaluate services provided
- Contacting individuals with respect to events and/or fundraising activities
- Providing receipts for services or donations
- Providing information about KWCS' activities
- Providing the public and funders with information about the Board of Directors

Personal Information may also be used for quality assurance, evaluation, accreditation, auditing and licensing processes. Individuals accessing personal information for these purposes are required to sign confidentiality agreements. This privacy policy does not cover statistical data from which the identity of individuals cannot be determined. KWCS retains the right to use and disclose statistical data as it determines appropriate.

Online Privacy

KWCS operates websites (www.kwcounselling.com, www.ok2bme.ca, www.parentingnow.ca) that provide information about KWCS, programs and services and other topics of interest to the general public. Through these websites, individuals can request more information about KWCS, provide

feedback, comments and inquiries, and participate in online forums and chat lines. Unless an individual chooses to provide personal information to us (e-newsletter subscription, website registration, e-mail messages, online event registration, photos, or online donations) no identifying information is collected. Our internet servers may passively and automatically collect certain information about website traffic, which may be linked to a visitor's Internet Protocol (IP) address (a unique Internet "address" assigned to all Internet users by their Internet Service Providers). Servers may record statistical information—such as visitors' IP addresses, types of operating systems, time and duration of visit, pages requested—and identify categories of visitors by items such as domains and browser types. These statistics are gathered and used collectively; no individuals are identified.

KWCS also makes use of various social media platforms and is not responsible for the privacy of any information anyone might share or glean from participating in the use of these platforms. KWCS recommends that clients not share personal information on social media.

Consent

There are various ways for individuals to give their consent to KWCS to collect, use and disclose personal information. Types of consent include:

- "*Express consent*" means the individual signs a consent form, or other forms containing personal information, authorizing KWCS to collect, use, and disclose the individual's personal information.
- "*Implied Consent*" means the organization may assume that the individual consents to the information being used, retained and disclosed for the original purposes, unless notified by the individual.

An individual's express consent will be obtained before or at the time of collecting personal information. An individual's implied consent is assumed for the collection of personal information if

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an individual verbally requests service before express consent can be obtained (i.e. a telephone intake), or by making a donation or registering for an event. The purposes for the collection, use, or disclosure of and who will have access to the personal information will be provided to the individual at the time of seeking express consent. Once consent is obtained from the individual to use information for those purposes, KWCS has the individual's implied consent to collect or receive any supplementary information that is necessary to fulfill the same purposes. Express consent will also be obtained if, or when, a new use is identified.

Consent may be given by an individual's authorized representative (such as a legal guardian or a person having power of attorney). Generally, by providing personal information it is assumed that individuals consent to collection, use and disclosure of that information for the purposes identified in this privacy policy or otherwise at the time of collection.

Withdrawal of Consent

Individuals may withdraw consent to collection, use and disclosure of personal information at any time, subject to contractual and legal restrictions and reasonable notice. If consent is withdrawn to certain uses of personal information, KWCS may no longer be able to provide certain services.

Disclosure of Personal Information

Personal information will be disclosed to only those staff members, interns, volunteers, agents and board members who need to know the information for the purposes of their work.

KWCS is permitted to use and disclose personal information to third parties *without* the individual's knowledge and/or consent, where:

- KWCS staff, interns and volunteers believe a client or someone else is in imminent danger of physical harm and information we have might prevent it (suicide or homicide).
- KWCS staff, interns and volunteers suspect a child under 18 may be in need of protection

(abuse, neglect, abandonment, and/or witnessing violence).

- KWCS staff, interns and volunteers are subpoenaed by a court of law.
- KWCS staff, interns and volunteers are presented with a search warrant.
- A client is experiencing a medical emergency (only relevant information will be provided to ensure client safety).
- A client discloses inappropriate behaviour by an allied health professional or other professional that affects clients.
- KWCS staff, interns and volunteers have reasonable grounds to believe a resident of a long term care home or retirement home has experienced abuse or is at risk of harm.

Retention of Personal Information

Personal information will be retained for such periods of time as may be prescribed by applicable laws and regulations.

In the event KWCS 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.

Access, Correcting or Updating Personal information

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, in writing, for access to the:

Chief Privacy Officer
KW Counselling Services
480 Charles St. East,
Kitchener, ON N2G 4K5
privacyofficer@kwcounselling.com

Upon verification of the individual's identity, the Chief Privacy Officer will respond within 30 days in writing. KWCS will provide access to personal information at no cost.

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If the individual finds that the information held by KWCS is inaccurate or incomplete, KWCS will make the required changes to the individual's active file(s) promptly, upon the individual providing documentary evidence to verify the correct information.

Complaints and Concerns

If an individual has a concern about KWCS' personal information handling practices, a complaint, in writing, may be directed to the Chief Privacy Officer. Upon verification of the individual's identity, the Chief Privacy Officer will act promptly to investigate the complaint and provide a written report of the investigation's findings to the individual.

Where the Chief Privacy Officer makes a determination that the individual's complaint is well founded, the Chief Privacy Officer will take the necessary steps to correct the offending information handling practice and/or revise the Agency's privacy policies and procedures. Where the Chief Privacy Officer determines that the individual's complaint is *not* well founded, the individual will be notified in writing.

Where an individual is not satisfied with the actions the Chief Privacy Officer may have taken to rectify a matter, or with the explanations given, they will be informed of their right to file a *Privacy Act* complaint, and will be given direction as to how to do so.