

**Ontario Association of Consultants, Counsellors,  
Psychometrists and Psychotherapists  
586 Eglinton Avenue East, Suite 410, Toronto, Ontario, M4P 1P2**

## **PRIVACY POLICY**

**Date of Privacy Policy: January 1, 2004; Revised May 10, 2012; Last Revised November 18, 2017**

**Name of Organization:** Ontario Association of Consultants, Counsellors, Psychometrists and Psychotherapists

The Ontario Association of Consultants, Counsellors, Psychometrists and Psychotherapists (hereafter referred to as "OACCPP") is an incorporated professional association formed in 1978 to represent providers of mental health services in the general areas of consulting, counselling, psychometry (assessment), and psychotherapy. It is a volunteer-run organization extending services to certified, general, affiliate and student members.

The mandate of OACCPP is to maintain and organize activities related to the professional enhancement of all of its members. Relatedly, OACCPP is dedicated to the betterment of mental health. The activities of OACCPP include maintenance of membership, recruitment of new members, organizing and standing committees on Ethics and Professional Conduct, Certification, Public Policy, Professional Development, Governance and Risk Management, and Certification. In addition, the OACCPP supports an Executive Committee that reports directly to a Board, as do the standing committee chairs. The OACCPP Board is responsible to the constituency of all OACCPP members, and that responsibility includes the maintenance of a Privacy Plan under the Privacy Legislation of Canada.

The collection and use of personal information by OACCPP is conducted only in the course of carrying out its responsibilities to its members.

**Consultants and Adjunct Staff:** Executive Director, Manager of Operations, Membership Coordinator, Communications and Professional Development Coordinator, Content and Managing Editor ("*Psychologica*", The Pulse), and Webmaster.

**Name of Privacy Officer:** Executive Director

**Accountability:** The Privacy Officer is accountable to the OACCPP Executive, and through that body, to the OACCPP Board of Directors. His/her responsibility is to orient members and consulting staff to the Privacy Plan, to maintain (and/or amend where appropriate) its contents and to respond to complaints from members of OACCPP regarding any aspect of the Privacy Plan.

**Commercial Activities:**

The commercial activities undertaken by OACCPP are: the collection of membership dues; the collection of registration and fees associated with Professional Development activities; the collection of fees pertaining to applications for certification; the payment of consultants hired to undertake certain tasks related to membership needs; the payments for the publication of "*Psychologica*" and The Pulse; and remunerations for contract staff and expenses associated with various Board committees as approved.

## **Inventory of Personal Information Collected**

In the course of its commercial activities, OACCPP collects the following personal information:

- Mailing addresses of all members and consulting staff, including e-mail addresses and telephone numbers;
- Mailing addresses, e-mail addresses and telephone numbers of all externally hired consultants;
- Mailing addresses and e-mail addresses of non-OACCPP members who wish to receive copies of "*Psychologica*";
- Application information supporting new membership queries and supporting data.

The Executive Director of OACCPP keeps this information.

The OACCPP also collects certification information that includes copies of transcripts, the answers to a certification examination, reference letters, and related correspondence. This information is kept by the Chair of Certification and distributed to an examination panel. Once the certification process is completed, this information shall be stored at the OACCPP office and any copies held by the Certification Committee shall be destroyed. Certification files shall be stored in the OACCPP office.

No client information is kept by OACCPP except in the case where a member of the public or a member of OACCPP has issued a query or complaint regarding professional practice.

## **Purpose of Collecting Personal Information**

Our primary purpose for collecting personal information from OACCPP members is (1) to ensure that they receive all relevant information regarding membership and benefits of membership, renewal of membership, insurance information, receipt of general mailings, accurate addresses for e-mail responses, and certification information; (2) to invoice members each year for renewal of membership and certification; (3) to request information from certified members regarding ongoing professional development activities.

Our primary purpose for collecting personal information from staff consultants is to maintain ongoing communication regarding business activities.

Our primary purpose for collecting personal information from external consultants is to review potential candidacy for a consulting opportunity, and/or to maintain ongoing liaison regarding consulting projects.

With respect to the above, written consent is sought before any information is shared with a third party.

## **Invoicing and Collection of Fees**

OACCPP members are invoiced once a year for their annual fees; applicants for certification are invoiced at the time of application for certification, and, following that, for the examination process. Staff and external consultants are remunerated as per their contractual arrangements with the organization.

## **Storage of Personal Information**

All personal information is held in secured electronic files, in the central OACCPP office under the supervision of the Executive Director at:

**586 Eglinton Avenue East, Suite 410, Toronto, Ontario, M4P 1P2**

### **Protection of Personal Information**

This Privacy Policy pertains to member files maintained by the Executive Director and the Committee Chairs mentioned above. Office space is used exclusively by the person(s) designated to retain this information. These premises have been inspected by the Privacy Officer, and by selected Board members to ensure their appropriateness and the files are restricted to use only by the Executive Director, his/her delegates, and the Committee Chairs responsible for maintaining updated information. Our policy requires that all files containing personal information be locked at all times, except while in use.

File cabinets are locked, and all e-documents are protected by a password, including member access to the OACCPP website. E-documents and online communication are housed on a secure server, to ensure that privacy will be maintained.

If for any reason, files containing personal information need to be transported, files will be locked in the trunk of a car, or transported, in situ, in secure containers. All paper information is transmitted through sealed, addressed envelopes by mail or by courier.

Voicemails from members are protected by confidential access codes.

All faxes and e-mails will identify the recipient and include a privacy clause that reads: "The information contained in this document is confidential and privileged and is intended only for the use of the addressee. Any use by another person is improper. If you have received this information in error, please contact our Privacy Officer/Executive Director at [executive-director@oaccpp.ca](mailto:executive-director@oaccpp.ca), 1-888-622-2779 or 416-298-7333."

Note that OACCPP will not, under any circumstances, distribute to a third party a mailing list of its full membership. Neither will OACCPP disclose the personal information, including a contact address for any individual member of OACCPP. The parties wishing access to member lists for promotion of educational workshops, advertising, etc., are invited to place an ad in "*Psychologica*", or insert an enclosure in one of the mailings of "*Psychologica*" or some other general mailing.

Resumes, performance reviews, and contracts of all consulting staff are kept in a locked filing cabinet in the offices of the OACCPP.

Resumes, contracts and performance reviews of all external consultants are kept in a locked filing cabinet in the offices of the OACCPP.

The resume, performance reviews, and contract of the Executive Director are to be kept by the President of the Executive Committee, in a locked filing cabinet.

**Retention and Destruction of Personal Information**

Member information is retained until a member advises the Executive Director that he or she is withdrawing their membership status. At that time, all personal information is archived, and destroyed five years after notice of withdrawal from the organization. Information from certification applicants is retained indefinitely, until a member advises the Executive Director and the Chair of the Certification Committee that he or she is withdrawing from the organization. At that time, the member's certification file is archived, kept for five years, and then destroyed. Destruction of all personal information is done with a shredder.

**Access**

Public queries and member queries regarding the Privacy Plan will be directed to the Privacy Officer. OACCPP will charge fees for copying member information, as, for example, in the provision of the determinations of an examination for certification. The organization may have appropriate grounds for refusing an access request, and will require confirmation of the identity of the individual making the request before disclosing any information. Information regarding liability insurance is held with the Insurance Brokers and OACCPP takes no responsibility for information regarding insurability or claims.

All OACCPP members have access to the Privacy Plan, which is posted on our website, and held by the Privacy Officer.

**Accuracy and Correction Requests**

To the best of our ability, OACCPP tries to maintain complete accuracy of records. We rely on members to change addresses or related personal information in a timely manner.

If a member believes that the information held in his or her file is inaccurate, he or she may request that it be corrected. Personal files are kept on each member and must be made available upon request.

## **Complaints Regarding the Privacy Plan**

The Privacy Officer/Executive Director is the only individual designated to receive and review complaints. S/he may review complaints in consultation with those Committee Chairs who have access to personal information and have been identified elsewhere in this document.

Any complaints must be made in writing, and a written acknowledgement of the complaint will be provided. All complaints will be investigated promptly and will be followed by a formal written decision, which will include a rationale for the decision.

*If a complainant finds the disposition unsatisfactory, he or she, may contact*

### **The Privacy Commissioner of Canada,**

30 Victoria Street  
Gatineau, Quebec  
K1A 1H3

OACCPP encourages all of its members to consult the following websites regarding this legislation:

<http://www.priv.gc.ca>

## **Availability**

The Privacy Plan will be posted on the website, and members of OACCPP are invited to communicate with the Privacy Officer, if they have any questions. In addition, a smaller brochure will be mailed out to all members. A copy of the plan will be kept at the office of the Privacy Officer, should members wish to consult the document.

## **Implementation**

It is OACCPP's commitment to fully implement the privacy needs of all of its members. All staff, Board Members and Committee Members will be briefed on the Privacy Policy and must sign a confidentiality agreement. The Privacy Officer will undertake regular monitoring of compliance over a 12-month period, at which time reviews and updates to the plan will be implemented as necessary.

The Privacy Plan, its monitoring and implementation, has been fully endorsed by the Executive Committee and the Board of Directors of OACCPP.