

Principle 1 Accountability

K3C Community Counselling Centres is responsible for personal client information in its custody and control.

The Accreditation Coordinator is appointed as the Privacy Officer for K3C.

Principle 2 Identifying Purposes

K3C collects basic information such as name, address, telephone numbers, birthdate and marital status. In addition, K3C may collect information relating to a client's employment history, personal health care history, financial history including credit and past payment records, educational history.

K3C 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. Purposes of counselling are outlined in the individual program philosophies & objectives.

K3C also uses the aggregate demographic information from the personal information collected to identify services and programs that may benefit the communities we serve; to target our marketing and awareness programs; and to maintain the ongoing financial support and cooperation of our financial stakeholders. No individual can be identified through this information.

Refer to: K3C program philosophies & objectives

Principle 3 Consent

K3C will not collect, use or disclose a client's personal information without the express consent of the client, except in cases where mandated by law.

Refer to: K3C confidentiality policy
K3C legal consent policy
K3C child abuse reporting policy
K3C intent to harm policy

Principle 4 Limiting Collection

K3C personnel collect personal information about individuals only when the individual is a client or potential client of the agency.

K3C 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 .

Principle 5 Limiting Use, Disclosure and Retention

K3C will only use personal information within the boundaries already predetermined by the agency and client. New purposes require new consent.

K3C will retain all counselling files for a minimum of seven years after the case is closed. Records for a client under the age of 18 will be retained for a minimum of seven years after their birthday. After that time, all applicable files are destroyed.

Refer to: K3C retention & destruction of records policy

Principle 6 Accuracy

During the course of service, K3C 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

K3C ensures that personal information is protected appropriately.

All K3C 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 K3C 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.

Refer to: K3C protection of client records policy

Principle 8 Openness

K3C communicates its privacy policy to clients by means of a handout.

Principle 9 Individual Access

K3C acknowledges that clients have a right to access their files for the purpose of 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.

Refer to: K3C client's right to access records policy
K3C legal consent policy
K3C copy of client records policy

Principle 10 Challenging Compliance

K3C 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 K3C Privacy Officer or designate. The Privacy Officer or designate will investigate the complaint and respond to the individual.

If K3C 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.