



Counselling & Student Wellbeing Services PRIVACY POLICY

1. Counselling and Wellbeing Services

George Brown College Counselling and Student Wellbeing Services (herein “GBC Counselling”) is located in Toronto, Canada and serves registered students who are experiencing mental health challenges, academic concerns, stress and interpersonal issues. George Brown College provides services in person and online from its Casa Loma, St. James, Ryerson or Waterfront Campuses. Our professional staff, including regulated health care providers are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide.

2. Consent

Please be advised that by providing personal information or personal health information to GBC Counselling in relation to our counselling services you consent to the collection, retention, use and disclosure of your information in accordance with this Privacy Policy and applicable privacy law.

3. Confidentiality

GBC Counselling recognizes that the information you provide is private and we are committed to keeping that information confidential. All information is collected, used, and disclosed in accordance with privacy legislation, such as the *Freedom of Information and Protection of Privacy Act* (“*FIPPA*”), R.S.O. 1990 and the *Personal Health Information Protection Act* (“*PHIPA*”), 2004.

This privacy policy, and our commitment to adhere to applicable privacy law, applies all personal information and personal health information that we collect in the course of providing counselling services. GBC Counselling understands and takes seriously its responsibility securely and lawfully handle all personal health information in our custody or control.

4. Collection, Use and Disclosure of Information

GBC Counselling will at all times comply with applicable privacy legislation in the collection, storage, use and disclosure of information.

GBC Counselling collects, uses and discloses personal information, as well as personal health information, for the primary purpose of providing counselling services and/or providing resources that may assist students with issues they are experiencing. GBC Counselling also collects, uses and discloses information for secondary purposes that include abiding by reporting obligations of licensed professions that are subject to professional Colleges (i.e. the College of Psychologists of Ontario, College of Social Workers and Social Service Workers, etc.), complying with legal obligations under privacy legislation, to administer, audit and improve counselling services, to communicate with students, for training and compliance purposes, and as required or permitted by law.

Personal health information is accessible within GBC Counselling Services by individuals who need to access the information in relation to counselling services. As well, personal information may be accessed by staff where needed to perform authorized services such as scheduling appointments, facilitating referrals, and managing information security.

4.a. Use of Cookies

GBC Counselling and third parties, such as Stella's Place, may use technologies including cookies, beacons, tags and scripts to collect online information. These technologies are used for a variety of purposes, such as analyzing, administering and improving our online services. By using our web-based services and/or visiting our websites, you consent to our use of cookies and similar technologies.

4.b. Google Analytics

George Brown College also uses Google Analytics to gather information about traffic on parts of the website and mobile application used to provide counselling services for statistical analysis of user behavior and to identify trends. The purpose of this information collection is to audit and improve users' experience and counselling services.

Google Analytics is a web analysis service provided by Google. Google utilizes the data collected to track and examine the use of the website and mobile applications, to prepare reports on those activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. Google collects cookies and usage data and processes such information in the United States. For more information on Google's use of information collected through Google Analytics, please consult Google's privacy policy. Google does offer an option to opt-out of analytics data collection.



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5. Third Party Service Providers

George Brown College may use third-party service providers to deliver certain services that require access to personal information stored in our servers. We have contracts with these service providers prohibiting their use or disclosure of this personal information for any purpose other than to provide their services to George Brown College. These third party service providers are also obliged to employ security safeguards to protect personal information.

6. Security Measures

George Brown College uses various physical, electronic and procedural means to safeguard personal and other information that it collects, including but not limited to:

1. ensuring your personal health information is stored securely in a physical file and/or in an electronic health record;
2. limiting access to the information to our Counselling Services staff and other support staff who require the information to provide services to the user;
3. limiting the access to and use of the information by third party technology service providers to that required to provide their services;
4. providing training to our employees about their responsibilities in relation to the protection of, and access of user information;
5. administrative safeguards such as reference checks of prospective Counselling Staff;
6. technological safeguards such as passwords and firewalls to control access to our electronic information systems; and
7. encryption of chat messages when in transit and encryption of stored online chat support conversation transcripts.

7. Retention of Information

In order to provide counselling services and to fulfill our legal obligations, George Brown College will need to retain personal information, including personal health information. We retain personal health information we have collected for 10 years, or, for minors, for 10 years from the date of the client's 18th birthday. This policy is based on direction from the College of Regulated Psychotherapists of Ontario (CRPO), which states:

Where the Registered Psychotherapist (RP) is the custodian of the clinical record, s/he retains the record for at least 10 years from the date of the last interaction with the client, or for 10 years from the client's 18th birthday, whichever is later. For example, if a student is age 18 at the time of the last interaction, the record would be kept until s/he is 28 years of age.)

8. Access and Correction of Personal Information

Requests for access to personal information must be made in writing. With only a few exceptions, students have the right to see what personal information Counselling Services has on file about them. Students will be asked to make this request in writing to Attention: Freedom of Information Coordinator. The Freedom of Information Coordinator can help you identify what records the Counselling Services might have about you. George Brown College reserves the right to charge a nominal fee for such requests. If the College cannot give you access, we will tell you within 30 days if at all possible and tell you the reason why access can not be provided.

If a student believes there is a mistake in the information, the student has the right to ask for it to be corrected. This applies to factual information and not to any professional opinions Counselling Services may have formed. Counselling Services may ask the student to provide documentation that the information in the file is wrong. Where Counselling Services agree that there is an error, the service will make the correction and notify anyone to whom it sent the incorrect information. If Counselling Services does not agree that there is an error, the service will include in the case file, a brief statement from the student on the point and then Counselling Services will forward that statement to anyone else who received the earlier information.

Requests for access or correction should be directed to the College's Freedom of Information Coordinator as indicated below along with any questions, concerns or complaints about our information practices, and/or management of specific information.

9. Contact Information

For any questions and concerns, or to submit an access or correction request, please contact the Freedom of Information Officer:

Phone: 416.415-5000 ext: 4646
Email: privacy@georgebrown.ca
Attn: Dr. Terry McQuaid, Psy.D., C.Psych.
George Brown College, Privacy Officer
160 Kendal Avenue
Toronto, ON M5R 1M3