

Privacy and Confidentiality Policy – Public

British Columbia and Alberta

Creative Rehabilitation Services Ltd. (CRS), doing business as **Creative Therapy Consultants (CTC)**, **Kids Creative Therapy (KCT)**, and **Seasons Health Therapies (SHT)**, recognizes the importance of privacy and the sensitivity of personal information. We are committed to safeguarding the personal information we collect, use, and disclose in the course of our operations across **British Columbia and Alberta**. This Privacy Policy explains how we manage your personal information and outlines our obligations under applicable privacy legislation.

Purpose

Creative Rehabilitation Services Ltd. (CRS), operating as Creative Therapy Consultants (CTC), Kids Creative Therapy (KCT), and Seasons Health Therapies (SHT), recognizes the importance of privacy and the sensitivity of personal information.

We are committed to protecting the personal information of our clients, funders, and all individuals with whom we interact. This includes the information we collect, use, store, and disclose while providing rehabilitation, counselling, and related health services across British Columbia and Alberta.

This Privacy and Confidentiality Policy explains:

- what personal information we collect and why,
- how we use and safeguard it, and
- when and how it may be shared in accordance with the law.

CRS complies with the Personal Information Protection Act (PIPA) in both British Columbia and Alberta, and with the Personal Information Protection and Electronic Documents Act (PIPEDA) for inter-provincial or federal matters.

If you have questions about how your personal information is handled, please contact one of our Privacy Officers:

- David McInerney – david@creativetherapyconsultants.ca
- Kelly Evans – kelly@creativetherapyconsultants.ca

1. Legislative Framework

CRS complies with all applicable privacy laws, including:

- *Personal Information Protection Act (British Columbia)* (PIPA-BC)

- *Personal Information Protection Act (Alberta) (PIPA-AB)*
- *Personal Information Protection and Electronic Documents Act (PIPEDA)* – for interprovincial and international data transfers

These obligations extend to all management, employees, contractors, students, and volunteers working under CRS.

2. Accountability

CRS is responsible for the personal information we collect and hold. Our Privacy Officers oversee compliance with this policy and applicable legislation.

Privacy Officers:

- **David McInerney**
P: 250-878-0364 E: david@creativetherapyconsultants.ca
- **Kelly Evans**
P: 250-212-2939 E: kelly@creativetherapyconsultants.ca

3. What Personal Information We Collect

Personal information is any information that identifies or could identify an individual.

CRS collects only the personal information required to provide rehabilitation and counselling services and to meet applicable professional, regulatory, and legal requirements.

This policy applies to all regulated and unregulated health professionals working with CRS, including but not limited to **Occupational Therapists, Kinesiologists, Registered Psychologists, Registered Clinical Counsellors, Vocational Consultants, and Rehabilitation Assistants.**

Where the professional standards or regulatory requirements of a College or Association impose stricter privacy or record-keeping obligations than this policy, those professional standards take precedence for that clinician's practice.

Example: Occupational Therapists must also comply with the College of Occupational Therapists of British Columbia (COTBC) and the Alberta College of Occupational Therapists (ACOT) privacy standards, which include specific record-retention timelines and breach-reporting requirements.

4. How We Collect Personal Information

We collect information directly from clients wherever possible, including at intake and during the course of service.

We may also collect information from third parties such as insurers, medical professionals, employers, or hospitals when authorized or required to provide services.

For privacy concerns that arise during client or funder interactions, staff should also refer to the **Dealing with Conflict – Funders and Clients** policy.

5. Multi-Disciplinary Compliance

CRS recognizes that its team includes multiple regulated health professions governed by distinct Colleges or professional associations.

All clinicians are expected to meet or exceed the privacy, record retention, and confidentiality requirements of both this policy and their professional body.

In cases of differing standards, the **stricter requirement shall apply**.

6. Consent

Informed consent is obtained before collecting, using, or disclosing personal information.

Consent may be written or verbal and may be implied when reasonably required to deliver services.

7. Use and Retention of Information

Personal information is used solely to:

- Provide rehabilitation and counselling services
- Administer and manage client files
- Meet regulatory and legal obligations

CRS securely retains client information in accordance with all applicable professional and legal requirements.

Unless a professional College or Association requires a longer retention period, CRS maintains client records for **a minimum of 16 years from the date of the last entry**, or, in the case of minors, **16 years after the client turns 19**.

Clinicians whose professional body specifies a different record-retention period must comply with their College or Association's standards.

Data may be retained longer when reasonably necessary (e.g., ongoing care, insurance, or legal matters).

All personal information is stored **securely within Canada only**.

Examples of differing professional retention requirements:

- BCACC and BCAA – 7 years from last entry (or 7 years after the client turns 19)
- BCPA / CAP (Psychologists) – 10 years
- COTBC / ACOT (Occupational Therapists) – 16 years

8. Disclosure of Information

Personal information may be disclosed:

- When required or authorized by law
- With your consent

- When impliedly required to deliver services
- To collect or enforce payment
- To third-party service providers (e.g., data storage) bound by confidentiality

We do **not** share personal information with third parties for marketing purposes.

9. Security Safeguards

CRS takes reasonable steps to protect personal information from loss, unauthorized access, or disclosure, including:

- Secured and alarmed premises
- Restricted access to client records
- Password-protected and encrypted systems
- Secure destruction of paper and electronic files

10. Access and Correction

Clients may request access to, or correction of, their personal information by submitting a written request to a **CRS Privacy Officer**.

Requests may be subject to reasonable administrative fees for retrieval or copies, in accordance with privacy legislation.

CRS will respond within a reasonable time and provide the information unless access is restricted under applicable law (for example, where disclosure could reveal another individual's personal information, threaten the safety of any person, or conflict with legal privilege).

If a request for correction is denied, CRS will annotate the record to reflect that a correction was requested but not made.

11. Confidentiality Obligations of Occupational Therapists

CRS health professionals, administrative staff, contractors, students, and volunteers share responsibility for protecting personal and confidential information.

Each regulated professional — including Occupational Therapists (COTBC, ACOT), Kinesiologists (BCAK), Registered Psychologists (BCPA/CPA), Registered Clinical Counsellors (BCACC/CCPA), and Vocational Consultants (various certifying bodies) — must also comply with their respective College or Association's Code of Ethics and privacy standards.

- Collect only necessary information for service quality
- Safeguard information during collection, storage, and disposal
- Maintain confidentiality indefinitely
- Share personal information only with consent or when legally or ethically required

12. Reporting a Security Breach

If a privacy or confidentiality breach occurs, CRS will follow all applicable College, Association, and legislative requirements.

British Columbia (COTBC, BCACC, BCAA etc.)

If a breach occurs involving the personal information of a client in BC, CRS will report the incident to the appropriate regulatory body (e.g., COTBC for Occupational Therapists, BCACC for Registered Clinical Counsellors, or BCPA for Psychologists).

The report will include:

- Practitioner details and contact information
- Description of the incident (date, scope, type of information involved)
- Steps taken to address the breach
- Preventive actions implemented to avoid recurrence

Alberta (OIPC / Applicable College)

If a breach occurs that may pose a real risk of significant harm, CRS will notify:

- The Office of the Information and Privacy Commissioner of Alberta (OIPC), as required by PIPA-AB; and
- Any applicable professional College or Association.
All affected individuals will be notified as soon as feasible.

CRS will maintain a record of all breaches as required by law.

All privacy or confidentiality breaches must also be reported internally to **HR** and the **CEO** using the **CRS Worker or Client Incident Report Form**.

The CEO will share reports with the Company Owners as required.

13. Communication and Email Security

Please note that email is not a fully secure communication method. Clients choosing to use email for communication accept this risk.

14. Changes to This Policy

CRS regularly reviews and updates this policy to ensure ongoing compliance with BC, Alberta, and federal privacy laws.

The most current version will always be available upon request or on the CRS websites.

Review Process:

This policy will be reviewed **annually by the designated Privacy Officers, Human Resources, and the Chief Executive Officer (CEO)**, or sooner if required following any major incident, legislative change, or system update affecting information security.

15. Contact for Questions or Requests

Clients may contact the Privacy Officer to:

- Access or correct personal information
- Withdraw consent
- Obtain more information about CRS privacy practices

16. Resources

Profession / Category	Province	Regulatory Body or Association	Website / Resource Link	Notes
Occupational Therapists	BC	College of Health and Care Professionals of British Columbia (CHCPBC) (formerly COTBC)	https://chcpbc.org/	Regulates OTs, Psychologists, and other health professions under BC's new amalgamated college.
Occupational Therapists	AB	Alberta College of Occupational Therapists (ACOT)	https://acot.ca/	Regulates OTs in Alberta under the Health Professions Act.
Kinesiologists	BC	British Columbia Association of Kinesiologists (BCAK)	https://bcak.bc.ca/	Self-regulating professional association; not a statutory college.
Kinesiologists	AB	Alberta Kinesiology Association (AKA)	https://www.albertakinesiology.ca/	Not a regulated health profession; follows professional association standards.
Registered Psychologists	BC	College of Health and Care Professionals of British Columbia (CHCPBC) (formerly College of Psychologists of BC)	https://chcpbc.org/	Regulates Psychologists and other health professions as of 2024.

Registered Psychologists	AB	College of Alberta Psychologists (CAP)	https://www.cap.ab.ca/	Regulates Psychologists in Alberta under the Health Professions Act.
Registered Clinical Counsellors (RCCs)	BC	BC Association of Clinical Counsellors (BCACC)	https://bcacc.ca/	Professional association; not yet a regulated college.
Registered Clinical Counsellors (RCCs)	AB	Canadian Counselling and Psychotherapy Association (CCPA)	https://www.ccpa-accp.ca/	National body for counsellors and psychotherapists; Alberta has no statutory college.
Vocational Rehabilitation Consultants	BC & AB	Vocational Rehabilitation Association of Canada (VRA Canada)	https://vraCanada.com/	National professional association; not a regulatory body.
Rehabilitation Assistants (RAs)	BC & AB	—	—	Not a regulated profession; must adhere to CRS policies, supervision guidelines, and applicable privacy laws.
Privacy Legislation	BC	Personal Information Protection Act (PIPA-BC)	https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/00_03063_01	Governs privacy of personal information in the private sector.
Privacy Legislation	AB	Personal Information Protection Act (PIPA-AB)	https://www.qp.alberta.ca/documents/Acts/p06p5.pdf	Governs privacy of personal information in Alberta.
Privacy Legislation	Federal	Personal Information Protection and Electronic	https://laws-lois.justice.gc.ca/eng/acts/p-8.6/	Applies to interprovincial and international data transfers.

		Documents Act (PIPEDA)		
Privacy Oversight Authorities	BC	Office of the Information and Privacy Commissioner for British Columbia (OIPC BC)	https://www.oipc.bc.ca/	Oversees compliance with BC's PIPA.
Privacy Oversight Authorities	AB	Office of the Information and Privacy Commissioner of Alberta (OIPC AB)	https://oipc.ab.ca/	Oversees compliance with Alberta's PIPA.
Privacy Oversight Authorities	Federal	Office of the Privacy Commissioner of Canada (OPC)	https://www.priv.gc.ca/en/	Oversees compliance with PIPEDA and federal matters.