

## **Privacy Policy**

### **Purpose of this policy**

Connect Counselling collects, works with, and retains its clients' personal information. This information is important in the optimal provision of counselling services. However, it is also important that the information is appropriately managed in accordance with law and ethical guidelines of the profession. This policy outlines how Connect Counselling handles clients' personal information.

### **Relevant Laws and other Documents**

The counselling service provided is bound by the legal requirements of the Hong Kong Professional Counselling Association – Code of Ethics (2001)

### **What is personal information?**

Personal information is any information which identifies you or could reasonably be used to identify you.

### **What personal information do we collect and why?**

In order to provide optimal counselling services, Connect Counselling will collect information from clients or referrers. As a base, the following information will likely be collected:

- Your name, address and date of birth.
- Your contact details.
- Current and past medical information.
- Your family medical history to the extent that it may inform current services.
- Your educational and occupational history.
- Legal or offending history (in the case of medico-legal services).

In addition, in the provision of counselling services, Connect Counselling will in all likelihood collect the following personal information:

- Responses and results from counselling tests and questionnaires.
- Responses and results reasonably obtained as part of a neurocounselling assessment.
- Information pertaining to your session notes; treatment plan and your response to treatment.

All of the above material is used to inform accurate assessment, diagnosis and treatment plans for Connect Counselling clients. Not having this information may increase the risk that the assessment, diagnosis, and treatment plans subsequently arrived at or generated are sub-optimal.

## **Information provided by third parties**

We will collect information from you where it is reasonable and practical to do so. We may also need to collect information from others who have known you a long time (such as a spouse or parent) or from others involved in your care (such as your GP). We will always endeavour to keep you reliably informed of the information collected and the source of that information, and where appropriate will seek and obtain written informed consent to contact and retrieve that information.

## **Use and disclosure of personal information**

Connect Counselling will use and disclose personal information for the primary purpose of providing optimal counselling services. This will primarily take the form of a report prepared by the clinician and sent to the referrer or referring agent, plus others involved in the client's care where applicable.

It is noted that in some circumstances Counsellors are required by law to disclose personal information without the consent of the client. Specifically, counsellors may disclose personal information if a "permitted general situation" exists such as to "lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety". This threat *does not need to be imminent*.

*There may be occasions when Connect Counselling discloses the personal information of a client where there is a serious threat to the life, health, or safety of an individual or the public, or on a rare occasion to assist in the location of a missing person.*

## **Storage and security of personal information**

All Connect Counselling clinicians will take reasonable steps to protect the personal information of clients from misuse, interference, or loss, and from unauthorised modification, access or disclosure.

Paper documents containing personal information listed above will be stored under lock. Electronic information containing personal information listed above will be stored and backed up securely, in accordance with the HKPCA Code of Ethics (2021).

## **Can you access your personal information?**

Following section 4.2.3 of the Code, "Counsellors provide reasonable access to records and copies of records when requested by competent clients in accordance with the Personal Data (Privacy) Ordinance of Hong Kong". Requests to access personal information need to be put in writing for security and recording purposes and to assist in finding the information for you.

Connect Counselling may refuse the request for such information, or limit the information so provided, where it is legally entitled to do so. We will endeavour to provide reasons for refusal.

For example, release of information may be denied or limited where such release may have an unreasonable impact on the privacy of others or is considered frivolous or vexatious.

### **Research and personal information**

On occasion Connect Counselling will engage in research activities to improve the quality of the service we provide. In such cases, personal information of clients will be used. In this context, the information will not be released to third parties, but will be retained within Connect Counselling for the *sole purpose* of quality evaluation and improvement of services.

### **Anonymity and Pseudonymity**

Where it is desired by Connect Counselling clients, and is practically and legally appropriate, the option is available to interact with Connect Counselling anonymously or using a pseudonym. This option is not available if doing so is impractical in terms of providing a counselling service or where the law or a court requires clients to identify themselves.

### **Counsellors' duty of care**

Connect Counselling is guided by the Hong Kong Professional Counselling Association (HKPCA's) Code of Ethics (2021). Section 4.2.3 of the Code relates to the appropriate Record Keeping of private information related to the provision of counselling services. Section 4.3.6 of the Code relates to Confidentiality and Privacy. The HKPCA Code of Ethics (2021) can be obtained from Connect Counselling, or from the HKPCA website (<https://www.hkpc.org.hk/about/code-of-ethics/>).

It is noted that under section 4.3.6 of the Code that counsellors disclose confidential information obtained in the course of their provision of *counselling services* if there is an immediate and specified risk of harm to an identifiable person or persons that can be averted only by disclosing information.

### **Changes to this policy**

We may from time to time make changes to this policy to reflect changes in the law or professional best-practice guidelines. All clients and referrers are encouraged to periodically review this policy to remain informed.