

4/25/2018

Privacy Handbook

Monica Place



INFORMATION ABOUT HOW WE PROTECT YOUR PERSONAL INFORMATION

Privacy Policy for Monica Place

The information provided below summarizes how your personal information will be protected. This document was developed in accordance with The Personal Health Information Protection Act, 2004 and The Quality of Care Information Protection Act, 2004.

Privacy of personal information is of the utmost importance. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. We are open and transparent in how we handle personal information. This document provides an overview of our privacy policies.

What is Personal Information?

Personal information is information about an identifiable individual. Personal information includes information that relates to: an individual's personal characteristics (e.g. gender, age, home address, phone number, family status); health (e.g. health history, health conditions, health services received) or activities (e.g. program history).

Collection of and Use of Personal Information: Primary Purposes

As an agency that provides support, we collect, use, and disclose personal information for the primary purpose of serving persons we support. While providing assessments and support, we may collect information about a person's health history including family history, social, psychological and behavioral functioning. This information is used in order to help us assess what a person's needs are to advise people of their options, and to plan and provide appropriate interventions and support. Information may also be collected to obtain a baseline of health, psychological and social information so that in providing ongoing services it is possible to identify changes that occur over time. It would be extremely rare for us to collect any information without the person's express consent. This might occur if we were to believe the person we support would consent if asked and it is impractical to obtain consent (e.g. a family member passing a message on from the persons we support, and we have no reason to believe the message is not genuine).

Collection of and Use of Personal Information: Secondary Purposes

As a service provider, we collect, use and disclose information for purposes that are related to, but are secondary to, our primary purposes. The most common examples of related secondary purposes are as follows;

We are regulated by The Ministry of Children and Youth Services, and the Canadian Centre for Accreditation (CCA). They may inspect our records and interview our staff as part of their regulatory activities in the public interest.

As an accredited Child and Youth Mental Health Agency, we will have an external audit every four years. As part of the accreditation review process our records will be inspected and our staff members will be interviewed. Members of CCA are also bound by confidentiality requirements; however, at that time persons we support will be given the option of having their file excluded from this process.

We have multiple programs and services within Monica Place. When a person we support is enrolled in more

than one program, multidisciplinary information may also be shared in order to provide the best support possible.

Monica Place supports research and program evaluation. For these purposes data from assessments may be collected in an unidentifiable, coded manner and aggregated for research or program purposes, all external research must comply with Monica Place policies and procedures. Names will never be released for this purpose.

Confidentiality

All information that is shared with Monica Place is confidential within the staff team. Anyone accessing personal information will have signed a Statement of Confidentiality. This means that information shared will not be told to anyone outside of Monica Place or sent to any other place without written permission.

Monica Place has Special Reporting Obligations

There are a number of important exceptions to confidentiality in which Monica Place staff are required to release information without consent due to professional or legal obligations. The exceptions are as follows:

- When Monica Place staff are concerned that someone may harm themselves, their child or another person.
- Where there is reason to suspect that a child is being abused, has been abused, or is at risk of being abused (physically, emotionally, or sexually). Staff are legally obligated to report all such information to a Children's Aid Society.
- When Monica Place staff and/or documentation of the agency are "subject to subpoena" by the court. This means that, when information is requested by a judge for a legal proceeding in family or criminal court either in the form of testimony or submission of relevant information, Monica Place must comply.
- When there is reason to believe that a regulated health professional (e.g., psychologist, physician) has sexually abused his/her client.
- The Ministry of Children and Youth Services requires demographics (age ranges, gender) and information about individual's needs, the services for which they are waiting, and services they are already receiving. This information is required for the purpose of program development and system-level decision-making. Personal information will not be shared, and the information is coded so that no names are used.
- Cases of a reportable communicable diseases must be reported to a Public Health agency.
- If a person is unable to make informed decisions for themselves, their parent, guardian, or public trustee may have access to personal information

Protecting Personal Information

We understand the importance of protecting personal information. To achieve this, we have the following procedures:

- Any individual who comes into contact with persons we support or their records or for any reason signs an oath of confidentiality prior to any access and follows all confidentiality policies and procedures that are in place. Access to information is restricted to the minimum extent possible to fulfill their duties.
- Electronic hardware is either used under supervision or secured in a locked or restricted area at all times.
- Paper information is either viewed under supervision or is secured in a locked or restricted area.
- Paper information is transmitted through sealed, addressed envelopes or boxes by Canada Post or a courier.
- Electronic information that is sent via email (e.g. to an offsite location) is password protected and encrypted. All personal information sent via email is kept to the minimum possible.
- No information with persons we support's name is sent via fax without prior consent.
- All Monica Place personnel are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this privacy policy and are bound by an oath of confidentiality.

Retention and Destruction of Personal Information

There will be a file kept to document participation in services at Monica Place. Records in the file are confidential and will be kept at Monica Place for 22 years after the date of the last contact.

Monica Place requires informed, voluntary and written consent before any verbal or written information can be released about persons we support outside the agency

All persons have the right to review Monica Place information documented in their file after providing a written request and according to agency protocol.

Consequences of Not Providing Information

Each service provided through Monica Place requires different types of information from you. If you choose not to provide requested information, we may not be able to provide you with specific services.

Concerns

We will attempt to answer any questions or concerns you might have regarding this.

Your contact person is:

Executive Director of Monica Place 231 Herbert Street, Waterloo, ON,
(519) 743-0291

If you have any objection to our privacy practices, you may make this objection in writing to the Executive Director and we will ensure that it is investigated promptly and that you are provided with a formal written decision with reasons.

This policy is made under The Personal Health Information Protection Act, 2004. This is a complex act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some exceptions to the commitments set out above. For example, we are bound by all reporting obligations under the Child and Family Services Act and these obligations take precedence over our obligations under the Personal Health Information Protection Act.

For general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The commissioner also acts as a kind of ombudsman for privacy disputes. The information and privacy commissioner can be contacted at:

www.privcom.gc.ca