



PROGRAM POLICY	
Policy # 6	Confidentiality
	Effective Date: January 1, 2011

Policy:

Confidentiality and the protection of personal privacy are important components of the Transitions to Home (T2H) program that reinforce the program principle of a participant centred approach. The program is bound by the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) as it is funded by and operates in close partnership with the City of Hamilton.

The MFIPPA mandate is to protect the privacy of individuals with respect to personal information held by an institution and provide individuals with the right to access that information. Access to personal information of applicants and participants should only be given to other organizations and their representatives who need the information to determine the eligibility of applicants and participants for needed services. For the purposes of the T2H program, written consent from the client participant will always be obtained in order to collect and share information.

The authority of T2H to collect and share information for this purpose is provided in legislation and this is communicated to participants through their entry into the program and the signing of the standard City of Hamilton shelter services Consent to Disclose and Verify Information form. Once this form has been signed, no further consent is required by recipients to share and collect information from the organizations mentioned on the form. From time to time as necessary under MFIPPA, T2H will obtain other consents from participants in order to speak with community services, organizations, landlords and other organizations not covered under the standard consent. Additional consents are obtained from participants when graphic and visual representation and records of participants are taken at T2H events.

T2H staff will be the holder of many confidences through their communication with participants and other staff members. All staff must acknowledge and accept that protection of confidentiality extends to verbal disclosure to family, friends, landlords and other contacts outside of the workplace. Personal verbal disclosures of participant identities, situations etc. are not permissible, when discussing “work” in personal lives staff must be cognizant not to disclose personal information that identifies participant’s and their situations.

T2H in work as a multi-disciplinary team of Social Workers and Social Service Workers chooses to follow the confidentiality standards of the Ontario College of Social Workers and Social Service Workers as these apply to multi-disciplinary teams. All team members explain to participants the need to share pertinent information within the Transitions to Home team.

Current Application:

All T2H staff, volunteers and student placements sign a confidentiality statement upon employment or volunteering with T2H.

Volunteers and Students do not sign consents as representatives of T2H.

All staff are cognizant about the organizations covered under the standard consent and when to obtain additional consents from participants.

All participants have the right to withdraw consent at anytime in the program.

Withdrawal of consent may affect the ability of Transitions to Home, a voluntary program to provide services.

All hard files are kept in locked filing cabinets.

Electronic information is kept secure, encrypted and stored on a protected server.

Confidential information may be stored on a laptop hard drive, memory stick or other storage device only as the exception with the approval of the Director.

All staff with or without professional registration follow the confidentiality and privacy requirements of the Ontario College of Social Workers and Social Service Workers.

Only individual staff has access to their rough case management and/or rough clinical notes. Rough notes are recorded in a manner that does not disclose full names. Staff use initials or first names with an initial.

When working with the media and police regarding participants the program's conduct is governed by policies that protect the personal privacy and rights of the participant (See Staff Conduct and Working with the Police policies) and follow applicable laws.

All paper and electronic files or documents are destroyed if they are inactive and date seven or more years after the date the file was started. Rough notes that contain names are destroyed after formal recordings have been made.

All staff inform each participant at the time of program entry about protection of privacy using the following script:

Transitions to Home considers the issue of your privacy very seriously which is why I want to have this conversation with you early in our work together.

We keep rough notes regarding our meetings with clients. These are used to create formal case notes which may be reviewed by my co-workers, Supervisor and the Director. We share necessary and pertinent information discussed between us within the program co-workers, supervisors and Director. Information is shared with the intent to provide services to you and the information is of a general nature. I may also consult with my colleagues for advice or ideas about our work together.

All case notes and information the program collects are kept for seven years, at which time they are destroyed.

Exceptions to confidentiality are:

If, I believe that you are at risk to hurting yourself (ex. contemplating suicide, are self-harming)

Or, *If I believe that you are capable of harming another person (ex. You are threatening, you are in possession of an unregistered firearm)*

Or, *if a child under the age of 16 is at risk – or you have shared knowledge of harm to a child*

Or, *if I believe that a child could be at risk given the information you have shared*

Then I will let you know of my concern, will speak to my Supervisor and/or Director, will inform the necessary people, which include child protection authorities, and the police. Do you have any questions?

Approval:

	2010
Signature & Title	Date Approved