



Notice of Information Practices

January 2020



Children, Youth and Families Thrive

Approved 20-Dec-19



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Notice of Information Practices

Overview

Ontario has a law that protects your personal information relating to services you receive from the Halton Children's Aid Society (Society). The Society is required to follow the privacy rules under the *Child, Youth and Family Services Act, 2017 (CYFSA)*. The Society is required to keep your personal information safe and secure. You have the right to know how we may use and give out your service information and how you can get access to it.

The Society is committed to promoting privacy and protecting the confidentiality of the personal information we hold about you and the services you have received.

Children's Aid Society Mandate

Children's Aid Societies (CASs) have the exclusive mandate to provide child protection services in Ontario. CASs work to promote the best interests, protection and well-being of children and youth. Every CAS in the province is responsible for a specific jurisdiction and, at times, CASs work together to fulfill their mandate.

Personal Information

The Society's records may include personal information collected to provide services to you including, for example, your date of birth, contact information, records of meetings with you and/or your family, services you received, programs you attended, details of your physical and mental health, medical, psychological or psychiatric reports, school information, financial information, employment history, allegations or findings of child maltreatment, court documentation, police interventions, criminal history, your views or opinions, the views and opinions of others about you and information about your race, ancestry, place of origin, colour, ethnic origin, citizenship, family diversity, disability, creed, religion, age, sex, sexual orientation, gender identity, gender expression, cultural or linguistic needs, marital or family status.

We collect, use, and disclose (meaning share) personal information to:

- investigate allegations that children may be in need of protection and, where necessary, protect children;
- assess, reduce or eliminate a risk of harm to a child or serious harm to other person or group of people;
- provide services to children and their families for protecting children or for the prevention of circumstances requiring the protection of children;
- provide care for children and supervise children under our supervision;
- assess and approve homes for children who cannot remain with their families;
- place children for adoption;
- plan and manage services;



Notice of Information Practices (cont'd)

- aid a law enforcement agency investigation;
- receive payment or process, monitor, verify or reimburse claims for payment;
- detect, monitor or prevent fraud or any unauthorized receipt of services or benefits;
- provide appointment reminders;
- seek consent (or consent of a substitute decision-maker), where appropriate;
- conduct risk management, error management and quality improvement activities;
- surveying service recipients;
- dispose of identifiable information;
- respond to or initiate legal proceedings;
- conduct research (subject to certain rules);
- compile statistics;
- report to the government as required by law;
- allow for the analysis, administration and management of the children's aid system;
- comply with legal and regulatory requirements; and
- fulfill other purposes permitted or required by law.

In child protection cases, the Society collects information about children who may be at risk of harm or in need of our services. This includes the personal information of the child and important people in the child's life. We collect this information from children, their families or indirectly from members of the community or other service providers.

We also collect personal information about caregivers and those who seek to provide care to children in need such as foster parents, adoptive parents and members of a child's extended family. We collect most of this information directly from those individuals.

Our collection, use and disclosure (sharing) of personal information is done in accordance with Ontario law.

Other Children's Aid Societies

CASs share information with each other to better protect children. Information collected by one CAS may be provided to other CASs when the other CAS needs to know the information to provide child protection services.

Service Providers

Service providers are persons or organizations who assist us to deliver services to children and families. We share only the information that is necessary for service providers to deliver and administer these services.

Notice of Information Practices (cont'd)

Other Third Parties

Sometimes we receive requests for information from third parties such as the police, government agencies and people involved in court cases with our clients. We only give personal information about service recipients to third parties if:

- we have the individual's consent;
- there is a court order, search warrant or urgent demand for records requiring disclosure; or
- we are legally permitted or required to provide the information.

If you have questions about this, please ask us.

Consent and Your Rights

The Society does not need consent to fulfill our primary role as a child protection agency, to protect children, where we are required by law to collect, use and disclose personal information. For example, we do not need your permission to meet our child protection obligations or to share your personal information to keep you or someone else safe (to assess, eliminate or reduce a risk of serious harm).

There are other situations where you have the right to make your own information privacy decisions. When we require and ask for your permission, you may choose to say no. If you say yes, you may change your mind at any time. Once you say no, we will no longer share your information unless you say so. Your choice to say no may be subject to some limits.

When there is a right to consent, you may make your own decisions if you are 'capable.' You may be capable of making some information privacy decisions and not others. If you are not capable, you will have a substitute decision-maker who will make your information decisions for you. Who can act as a substitute decision-maker and what they have to do is also set out in law.

For children, there is no legal age when you become able to make your own decisions about your personal information. If you are capable, you can make your own decisions. However, if you are under the age of 16, there are some additional rules to know.

- If you **are not** capable, your parent(s) or other official guardian will make decisions for you as your substitute decision-maker.
- If you **are** capable, you will make your own decisions.
- If you **are** capable, your parent(s) or guardian will also be allowed to make some decisions about your personal information service records, but they will not be able to make decisions about any records about treatment or counseling to which you alone consented.

We encourage you to ask your assigned worker questions to find out more about privacy and your family.



Notice of Information Practices (cont'd)

Retention and Disposal of Information

The Child Protection Information Network (CPIN) is a provincial information management system used by CASs. CPIN is the primary tool for storing information needed to deliver CAS services.

CPIN contains information about children and their families who receive child protection services. It also contains information about caregivers and those who seek to provide care to children in need such as foster parents, adoptive parents and members of a child's extended family.

In CPIN, information is stored in person, case and provider records designed to hold the unique information for each service. Person, case and provider records are linked, when appropriate, to create an overall picture of a client or caregiver's child protection services.

We also have some older paper and electronic case files that predate CPIN.

We keep the information collected because it might be necessary for future cases. We also keep the information because former service recipients may ask to see their records. When we dispose of personal information, we do so securely.

Safeguards

Your personal information must be kept private and secure. All employees and volunteers at the Society are bound by confidentiality. We have to protect your information from loss or theft and make sure no one looks at it or does something with your information if they are not involved in providing services to you or allowed as part of their job. If there is a privacy breach, we will tell you (and we are required by law to tell you).

This applies equally to what we enter into CPIN and other electronic information systems as well as paper or electronic copies of records, reports, financial records, administrative notes, voice messages, text messages and emails (including on laptops and cell phones) and any other ways personal information can be recorded.

Access and Correction

With limited exceptions, you have the right to access the personal information we hold about you that relates to a service provided to you.

If you need a copy of your service records, please contact the Records Management team.

In rare situations, you may be denied access to some or all of your personal information about service (with any such denial being in accordance with the law).

Notice of Information Practices (cont'd)

We try to keep your personal information accurate and up-to-date. Please let us know if you disagree with what is recorded and we will make the change or, otherwise, we will ask you to write a statement of disagreement that we will attach to your service record.

For More Information or Complaints

We encourage you to contact your assigned worker with any questions or concerns you might have about our information practices. You can also reach our Records Management team or Privacy Lead by contacting the Society at 905.333.4441.

If your questions have not been answered or issues not resolved to your satisfaction, you may wish to make a formal complaint. Please [CLICK here](#) to access our Resolving Concerns and Complaints information. [CLICK here](#) to access the Ministry of Children, Community and Social Services Internal Complaints Review Panel (ICRP) Form. You can also call and request a paper copy.

Or, if you feel your concerns have not been addressed to your satisfaction, you have the right to complain to the Information and Privacy Commissioner of Ontario (IPCO). The IPCO is responsible for making sure privacy laws are followed in Ontario.

The Commissioner can be reached at:

Information and Privacy Commissioner of Ontario

2 Bloor Street East, Suite 1400

Toronto, ON M4W 1A8

Phone: 416.326.3333 or 1.800.387.0073 | **TDD/TTY:** 416.325.7539 | **Fax:** 1-416-325-9195

Email: info@ipc.on.ca | **Website:** www.ipc.on.ca