



PRIVACY POLICY

INFORMATION ABOUT HOW WE PROTECT YOUR PERSONAL INFORMATION

Privacy Policy for Crossroads Children's Mental Health Centre (CCMHC)

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 also try to be 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 and views (e.g. opinions).

CONSENT, ACCESS TO, COLLECTION OF AND USE OF PERSONAL INFORMATION: PRIMARY PURPOSES

As a children's mental health center we collect, use, and disclose personal information for the primary purpose of serving our clients. This information is collected and used with your written consent. Generally, In the course of providing assessments and treatment, we collect information about a person's health history including their family history, social and behavioral functioning, and social situation. This information is used in order to help us assess what our client's needs are, to advise clients of their options, and to plan and provide the interventions and treatment when requested. Information may also be collected to obtain a baseline of health 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 client's express consent. This might occur if we were to believe the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from the client and we have no reason to believe the message is not genuine). If you are interested in accessing your personal health information collected by CCMHC or would like to correct any of your information, please contact your assigned worker and/or contact the CCMHC Privacy Officer.

COLLECTION AND USE OF PERSONAL INFORMATION: RELATED AND SECONDARY PURPOSES

As a health care 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:

As a children's mental health center we:

- Are regulated by The Ministry of Children, Community and Social Services, and the Ministry of Health. They may inspect our records and interview our staff as part of their regulatory activities in the public interest.
- Are accredited by the Canadian Centre for Accreditation. As part of the accreditation review process our records are inspected and our staff are interviewed. Accreditors are also bound by confidentiality requirements; however, at that time you will be given the option of having your file excluded from this process.
- Work within a multidisciplinary team approach. This means that cases are discussed in a group supervision format with a goal to enhancing treatment planning and quality.
- Have multiple programs and services within our center. When a client is shared between two programs information and multidisciplinary information may also be shared in order to provide the best treatment possible.
- Support research and program evaluation. For these purposes your child's file may be reviewed by an external person for research, if approved by the CCMHC Research Ethics Committee. However, **no names will be released for this purpose.**
- Have special reporting obligations:
 - The Ministry of Children, Community and Social Services, and the Ministry of Health require demographics (age ranges, gender) and information about children's needs, the services for which they are waiting, and

services they are already receiving. This information is required for program development and system-level decision-making. Personal information will not be shared; the information is coded. **No names are used.**

- Please know that under the Child, Youth and Family Services Act 2017 we have a duty to report, without your consent, any unexplained injuries we see or any statement from your child which might indicate that treatment they are experiencing at home might be abusive. We will usually consult with the Children's Aid Society regarding whether a concern is reportable and then must act on their recommendation. We will ask them whether we can be the ones to tell you about the call and whenever possible this will be our procedure. Our relationship with you is important to us, but sometimes this obligation creates difficulties, and you need to know this at the outset.
 - If we are told that someone is planning to seriously harm themselves or someone else, we have an obligation to keep these people safe. At times this may mean divulging information without consent.
- If there is a court case and the judge demands it, we must release the file to the judge who will decide if any information is relevant to the trial.
 - Be mindful that, If the other parent/caregiver who has a right to access information about their child(ren) makes a request for information, CCMHC will provide that information as legally required.

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 our clients or identifiable client records for any reason signs an oath of confidentiality prior to any access and follows all confidentiality policies and procedures that are in place. Access is restricted to the minimum extent possible to fulfill their duties.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times.
- Paper information is either 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., from an offsite location to be included in the client's main file) is password protected. All email transmissions have a privacy clause and transmittal by this medium is kept to the minimum possible.
- All CCMHC 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

We need to retain personal information for some time to ensure that any questions you might have about the services provided can be answered and to ensure our own accountability to external regulatory bodies. In keeping with ministerial guidelines, we keep client files for at least twenty years.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when hardware is discarded, we ensure that the hard drive is physically destroyed.

WEBSITE COOKIES

Website cookies are small data files that are placed on your computer or mobile device when you visit any website. Cookies are widely used by website owners in order to make their websites work - or work more efficiently, as well as to provide reporting information.

CCMHC's website, crossroadschildren.ca, only collects cookies that are strictly necessary for our website to function properly, and therefore cannot be disabled by users. There are two; both are for analytics and customization purposes. To make our website usable for people with disabilities and to comply with the Accessibility for Ontarians Disabilities Act (AODA), CCMHC uses Userway as its web accessibility solution for WCAG compliance. Please contact us for Userway's cookie policy:

CONCERNS OR QUESTIONS

We will gladly attempt to answer any questions or concerns you might have regarding CCMHC and our privacy practices. You have the right to refuse, place limits on (lock box) or withdraw your consent for the collection, use and disclosure of your personal information at any time by contacting:

Michael Hone, Executive Director/CCMHC Privacy Officer
1755 Courtwood Crescent

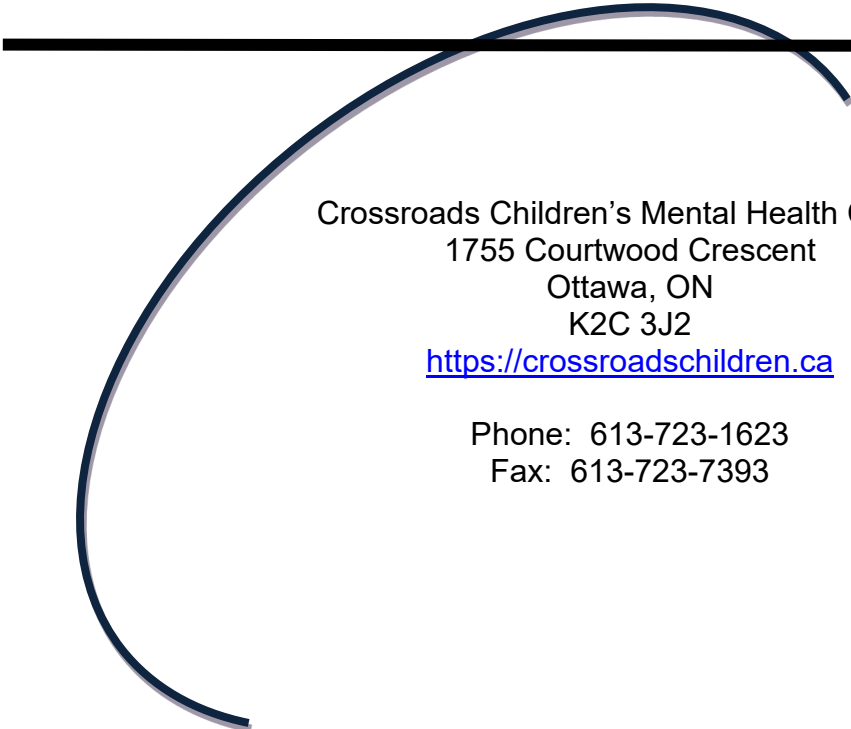
Ottawa, Ontario K2C 3J2
(613) 723-1623 ext. 228
mhone@crossroadschildren.ca

If you have any objection to our privacy practices, you may make this objection in writing to Mr. Hone 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* (refer to the agreement to service and to our information package for complete details) and these obligations take precedence over our obligations under the *Personal Health Information Protection Act*.

For general inquiries or complaints, the Information and Privacy Commissioner of Ontario 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:

Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400 Toronto, ON M4W 1A8
To contact the IPC, including the Commissioner, please email info@ipc.on.ca



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May 2023