



YOUVILLE CENTRE

PRIVACY HANDBOOK

INFORMATION ABOUT HOW WE PROTECT YOUR PERSONAL INFORMATION

Youville Centre Privacy Policy

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*, *The Quality of Care Information Protection Act, 2004* and *Child, Youth and Family Services Act, 2017 - Part X, 2019*.

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 a Treatment Centre we collect, use, and disclose personal information for the primary purpose of serving our clients. In the course of providing assessments and treatment, we may collect information about a person's health history including her family history, social, psychological and behavioral functioning, and social situation. This information is used in order to help us assess what our clients' needs are, to advise clients of their options, and to plan and provide appropriate interventions and treatment. 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 client's express/implied 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). Additionally, personal information is used to inform your academic goals and school program, provide you with assistance and advocate on your behalf, and finally to support you with your children development goals and experience in childcare program.

Collection of and Use of Personal Information: 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 Treatment Centre with a licensed Child Development Centre, we are regulated by The Ministry of Children, Community and Social Services, The Ministry of Education, 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 agreements; however, at that time clients will be given the option of having their file excluded from this process.
- Access to your personal information is not absolute however, you have the right to:
 - ask for access to your personal information
 - ask for a correction to be made to your personal information
 - refuse the use of your personal information
 - withdraw your consent to share your personal information
 - complain to the Privacy Officer (Executive Director) or Privacy Commissioner
- We work within a multidisciplinary team approach. This means that cases are discussed in a group supervision format with a goal of enhancing treatment planning and quality. Written and/or verbal permission is also required by the client before a therapist can share information at these meetings. We have multiple programs and services within our Centre. When a client is shared between two programs, multidisciplinary information may also be shared in order to provide the best treatment possible.
- Youville Centre supports research and program evaluation. For these purposes data from client assessments may be collected in an unidentifiable, coded manner used, and aggregated for research or program purposes. All external research must comply with Youville Centre policies and procedures. Identifiable information will never be released for this purpose.

Special Reporting Obligations

- The Ministry of Children and Youth Services requires demographics (age ranges, gender) and information about individuals 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 to be unidentifiable.

- Please know that under the Child, Youth and Family Services Act we have a duty to report, without client consent, any unexplained injuries we see or any statement from a child which might indicate that the treatment the child is 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. Our relationship with our clients is important to us, but sometimes this obligation creates difficulties for the client. Clients will be reminded of this policy throughout their time at Youville Centre.
- If we were told that someone is planning to seriously harm themselves or someone else, we have an obligation to keep these people safe. This may mean divulging information without consent.
- Cases of reportable communicable diseases must be reported to Ottawa Public Health (OPH).
- If there is a court case and the judge demands it via subpoena or warrant, we must release the file to the judge/law enforcement agency who will decide if any information is relevant to the trial/investigation.
- If you are unable to make informed decisions for yourself, your parent, guardian or public trustee may have access to information about you.
- In an emergency, if you are injured to contact a parent/guardian, relative, or friend.
- If you are granted access to your file or provided copies of file materials.

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 to information is restricted to the minimum extent possible to fulfill their duties.
- As a centre, we follow multiple proactive security measures to protect your information including electronically (e.g., strong passwords), physically (e.g., kept under supervision or secured in a locked/restricted area at all times), and internally (e.g., meeting behind closed doors and using sound machines).
- Electronic and/or hard copy information is either used under supervision or secured in a locked/restricted area at all times.

- Hard copy information is transmitted through sealed, addressed envelopes or boxes by Canada Post/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 a client's name is sent via fax without prior consent.
- All Youville Centre 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.
- In the extremely rare event of an information breach, we will make every effort to contain, assess, investigate, track and repair an identified breach. As a client, you will be notified of the breach if it includes your personal information.

Retention and Destruction of Personal Information

We need to retain personal information for some time to ensure that any questions clients might have about the services provided can be answered and to ensure our own accountability to external regulatory bodies. After five years, paper files are shredded. Electronic alumni files are held complying with the same standards as active client records, according to Youville Centre policies and procedures.

Consequences of Not Providing Information

Each service provided through Youville Centre 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.

Special Consideration: Photos, Videos & Public Relations/Media Participation

If our staff wish to use any photos or videos taken on site publicly, consent and participation forms will be provided to you. To maintain the privacy of all our clients we ask that no one uses applications such as FaceTime or Skype in common areas.

Due to potential for misuse/misrepresentation, the clinical team will follow a process of screening, approval, and support for clients interacting with or participating with public media. The clinical team will provide consent forms for formal media participation.

If you attend an informal media event, you are responsible for your participation and comments.

Concerns

We will attempt to answer any questions or concerns you might have regarding this. Your contact person is:

Executive Director of Youville Centre
150 Mann Avenue Ottawa, Ontario, K1N 8P4
(613) 231-5150 ext. 105

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, Youth 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](#) 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:

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