

MADISON COMMUNITY SERVICES
Personal Information Protection Policy/ Statement

Madison Community Services is committed to safeguarding the personal information entrusted to us by our clients. We manage your personal information in accordance with Ontario's *Personal Information Protection Act* and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to Madison Community Services and to any person providing Case Management and or Housing services on our behalf. A copy of this policy is provided to any client on request.

Personal information means information about an identifiable individual. This information includes an individual's name, home address and phone number, age, sex, marital or family status, financial information, health information, educational history, etc.

1. What Personal Information Do We Collect?

We collect only the personal information that we need for the purposes of providing services to our clients, including personal information needed to:

- Deliver voluntary Case Management Services
- Provide appropriate referrals for our clients
- Coordinate services for our clients

We normally collect client personal information directly from our clients. We may collect your information from other persons with your consent or as authorized by you for the provision of services.

We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information.

2. Consent

We ask for consent to collect, use or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask clients to provide their consent orally in person, or by telephone, or in writing by signing a consent form.

In cases that do not involve sensitive personal information, we may rely on "opt-out" consent. For example, we may disclose your contact information to other organizations for the purposes of providing Case Management Services, unless you request that we do not disclose your information to anyone else. You can do this by informing your Case Manager that this is your wish.

A client may withdraw consent for the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our Case Management obligations. We will respect your decision, but we may not be able to provide you with services if we do not have the necessary personal information.

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We may collect, use or disclose client personal information without consent only as authorized by law in matters when we are legally obligated to share information with others such as when:

- Served with a legal subpoena/warrant
- Incidents of child abuse and/or suspected child abuse are identified
- Issues of safety and security of a client or others is assessed and evident

3. How do we use and disclose personal information?

We use and disclose client personal information only for the purpose for which the information was collected, except as authorized by law.

If we wish to use or disclose your personal information for any new purpose, we will ask for your consent.

4. How do we safeguard personal information?

All staff and volunteers with access to information are required, as a condition of employment or volunteer role, to respect the confidentiality of personal information and protect personal information in their control against such risks as loss or theft, or unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security safeguards.

Safeguards may include physical measures such as locked file cabinets, organizational measures such as staff training, limited access and security clearances and technological measures such as passwords.

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases, we may ask for a written request for correction.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal purposes.

5. Access to records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of Madison Community Services, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual. We will need to verify your identity before providing you with the personal information we hold about you.

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If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases, where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to our designated Privacy Officer. You must provide enough information in your request to allow us to identify the information you are seeking.

We will respond to your request within 60 calendar days, unless an extension is granted. We will advise you of any fees that may apply before beginning to process your request.

6. Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by Madison Community Services, or about a request for access to your own personal information, please speak to your Case Manager or contact our designated Privacy Officer at 416-977-1333 Ext. 102.

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Ontario:

Office of the Information and Privacy Commissioner of Ontario
Suite 1400 – 2 Bloor Street East
Toronto, Ontario
M4W 1A8

Phone: 416-326-3333

Toll Free: 1-800-387-0073

Email: info@ipc.on.ca

Website: www.ipc.on.ca