

**Privacy Impact Assessment for
the Child Welfare Transitions Database
and
the Integrated Response Records (IRR) Database
of
Developmental Services Toronto (DSTO)**

Prepared by

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The consultant is not a lawyer and is not offering legal advice. It is understood
that the Geneva Centre for Autism will seek legal advice as required.

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Table of Abbreviations Used in this Privacy Impact Assessment

CYSIS	Children and Youth Services Information System (Toronto)
DS	Developmental Services
DSTO	Developmental Services Toronto
<i>FIPPA</i>	<i>Freedom of Information and Protection of Personal Information Act (Ontario)</i>
IRR	Integrated Response Records Database
MCSS	Ontario Ministry of Community and Social Services
MCYS	Ontario Ministry of Children and Youth Services
<i>PHIPA</i>	<i>Personal Health Information Protection Act (Ontario)</i>
<i>PIPEDA</i>	<i>Personal Information Protection and Electronic Documents Act (Canada)</i>
SIR	Service Inquiry Records Database (now IRR)

Introduction and Overview: Developmental Services Toronto

- The Ontario Ministry of Community and Social Services (MCSS) funds the various developmental services agencies in Toronto that provide services and are connected through the Developmental Services Toronto (DSTO) web site. Each of the thirty-two is part of a collaborative network of services and supports. They are individual funders and users of the databases described in this Privacy Impact Assessment (PIA)
- The website of Developmental Services Toronto contains databases under development for Child Welfare Transitions and for Integrated Response Records (IRR), which are the subject matter of this Privacy Impact Assessment.
 - The Geneva Centre for Autism is the custodian of the dsto database.
 - The Child Welfare Transitions database includes teens who are crown wards and who will enter the Developmental Services (DS) adult system once they come of age (eighteen) and special needs agreement children. This database also includes information on teens whose parents are still legally involved in their care working with the Special Needs Team. This team has fifteen staff: 13 are from Delisle Youth Services (DYS), which oversees the Special Needs Team, and two are seconded from different agencies.¹ Perhaps forty children and youth per year will be entered on the Transitions database.
 - Four agencies in Toronto with a child welfare focus are the primary users of the Transitions database, including:
 - The Children’s Aid Society (CAS) of Toronto.²
 - The Catholic Children’s Aid Society (CCAS) of Toronto.³
 - Jewish Child and Family Services of Toronto.⁴
 - Native Child and Family Services of Toronto.⁵
- ⁶This Transitions Database records limited personal information on adolescents transitioning to adulthood. The primary identifiers are the birth date and initials of the young person; full names and addresses are not collected. Children’s Service Workers do the data entry for individual child welfare agencies, which data are accessible to families of children in need in limited circumstances. Teens that are connected to the Special Needs Team have families involved in their lives; upon request, they can have access to

¹ See <http://www.delisle-youth.org/service/specneeds>

² <http://www.casmt.on.ca/> “The Children’s Aid Society of Toronto is one of the largest child welfare organizations in Canada. It is an incorporated not-for-profit agency governed by a volunteer board of directors and funded by the Province of Ontario.”

³ <http://www.ccas.toronto.on.ca/> “The Catholic Children’s Aid Society of Toronto is funded and regulated by the Ministry of Children and Youth Services and mandated by the Child and Family Services Act to protect Catholic children in Toronto age 16 and under from abuse and neglect.”

⁴

http://www.jfandcs.com/Client/JFCS/JFCS_LP4W_LND_WebStation.nsf/page/Childrens+Aid+Society!OpenDocument

⁵ <http://www.nativechild.org/SitePages/?section=5&page=66>

⁶ <http://www.nativechild.org/>

the teen's information.⁷ Currently this would be printed or accessed electronically with a staff member. The Project has not created an access level for families to access information by logging into the database on their own. For IRR, they are waiting to see what parents want with respect to automated log-in to the system. Since the database is accessed through the Internet, parents would only need access to a terminal and have an authorized user name and password. No special software is required.

- The Integrated Response Record (IRR) database contains the record of an inquiry made by an adult or legal guardian/parent for services in the DS system. The IRR database allows an operator in touch with a family to enter appropriate data, which then permits the administrator of the system to arrange consultations with the designated Interim Support Consultant at appropriate agencies. Approximately 800 families per year will use this service. After the family has selected the lead agency that it wishes to use, only the lead agency providing service to that client can access this record. After receipt of such notification, the lead agency controls the file on the child.⁸ Such records exist electronically and on paper. Each agency has its own filing and database systems for its clients.

⁷ There is also parental or guardian involvement for some special needs agreement families and for a number of crown wards.

⁸ Transitions Implementation Working Group, "Report of Detailed Planning for Age-14 Protocol for Ministry Review," September 30, 2007, p. 1.

Description of the Databases of Developmental Services Toronto

1. General Goals of the Databases

- The Transitions Database and the Integrated Response Record are essentially administrative records used for management and reporting of services delivered to youth and young adults. They are not case records as such.
- With respect to the Transitions Database, the Ontario Ministry of Community and Social Services and the Ontario Ministry of Children and Youth Services (MCYS), Toronto Region, have funded a project to develop and implement protocols for planning and access among four Child Welfare agencies, the Special Needs Team, and Developmental Services (DS) agencies.
 - “The ‘target population’ for inclusion in the initiative comprises individuals who have a developmental disability, are residing in per diem placements, and are either crown wards or receiving services from the Special Needs team.⁹ The goal of the initiative is to ensure equitable access to adult Developmental Services for the target population. The objective of protocols between the sectors is to facilitate the transition of individuals who require adult supports from the developmental services sector by strengthening community partnerships and mutual planning between the sectors.”¹⁰
 - A high-level ‘map’ for collaboration among Child Welfare agencies, the Special Needs team, and adult Developmental Services identifies four primary age-points (ages 14, 16, 18, and 21) as key intersections at which transition planning can be strengthened by collaboration between the Developmental Services (DS) system and Child Welfare agencies or the Special Needs team.¹¹
- The goals of the IRR:
 - To reduce the number of times a family tells its story. A family only needs to call one agency to apply for services within the DS System.
 - Families registered to the IRR are connected to an Access Consultant (if the family agrees to an interim visit), who can provide short term support to the individual/family while waiting for long term services.

2. The Need for the Databases

- For the Transitions Database, a primary objective at age 14 is to provide the DS system with consolidated data about the ‘target population’ for planning purposes. Planning data starting at age 14 are required because the profile of these children as crown wards differs somewhat from that of other children with developmental

⁹ Crown wards and special needs agreement families are also included.

¹⁰ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, pp. 2-3.

¹¹ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, pp. 2-3.

- disabilities who live in family homes in the Toronto community. There are both Child Welfare and Special Needs children in these groups.¹²
- “The purpose of collecting this information is to provide the DS system with data that will be used in system planning. This will allow the DS system to understand, anticipate, and plan for emerging needs.”
 - Personal information submitted by Child Welfare agencies and the Special Needs Team will be consolidated and used to generate confidential reports which will be provided to DS system groups and to the Ministries of Community and Social Services and the Ministry of Children and Youth Services.¹³
- A source of centralized data for Transitions will enable the DS system to do the groundwork required to support equitable access to services over the long term for these individuals. For example, analysis of data at age 14 will allow the DS system to anticipate geographic (area of residence) and other issues that will arise when consultation services are required at age 16 - particularly for children who reside out of Toronto Region - and to align (or request) the required resources to deliver Integrated Response consultation to these children and their parents or legal guardians (including Child Welfare agencies as guardians).¹⁴
 - The intent of the Transitions (children) and the IRR databases (adults) is to reduce time lags in providing services to children in need, who are aged 14 to 16 and eligible for services at the age of eighteen. The reality is that there are many more requiring services than spaces or funds available.
 - Individuals can access developmental services for adults once they have reached the age of 18. Individuals requiring services at or after 18 years of age can go on a waiting list beginning at age sixteen.
 - The two databases are in part intended to accustom service providers to the use of electronic records, since most of them work at present with paper-based systems, including the Geneva Centre for Autism. Some agencies have recently started on using an electronic system developed for the Toronto Children and Youth Services Information System (CYSIS).¹⁵

3. Current and Intended Scope of the Databases

- dsto.com is the website for the more than 30 Toronto agencies that are working together to provide responsive, high quality services and supports to adults with developmental disabilities and their families.¹⁶ MCSS funds it. This professional site houses the Transitions and IRR databases. It is a public web site.

¹² Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, pp. 3-4.

¹³ <http://www.dsto.com/tpadmin/transhelp.php?modify=showHelpform&page=background>

¹⁴ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, p. 4.

¹⁵ See <http://www.torontodacs.net/dispatcher.asp?page=129&sub=138> “The Children and Youth Services Information System (CYSIS) is a comprehensive tool designed to assist Ministry of Children and Youth Services (MCYS) Transfer Payment agencies in Toronto with data collection, management, and reporting in a streamlined, consistent manner.”

¹⁶ <http://www.dsto.com/about.html> . For a list of partners in the Toronto Developmental Services partnership, see <http://www.dsto.com/partners.html>

- The Transitions Database (which is now populated with some live data) will not be housed on the professional side of dsto.com. Professional staff of the child welfare agencies and special needs team can access it through a separate URL. Data from the website will be transferred through an electronic process into the IRR database at some time in the future, as required for a particular case. At present, the IRR database that is accessed on the professional site is only a blank form. The IRR with data is accessed through the Administrative site, which also has a separate URL. This means that the person doing data entry for the IRR no longer has access once the blank form is populated with data and submitted; an authorized user of the IRR database will then have such access as required to manage a particular case.
- For the Transitions Database, workers from Child Welfare and the Special Needs team will have restricted access to a web site, where they will enter limited identifying information on an on-line template after assessing the eligibility and needs of individuals at the age of fourteen. Each Child Welfare agency and the Special Needs team will house their own personal information in a discrete, separate segment of Transitions.¹⁷
- Staff entering profiles on the Transitions Database are instructed that:
 - “Information should only be entered about individuals who:
 - Are between the ages of 14 and 16;
 - Are crown wards or special needs agreements and reside in an external per diem placement or external foster home;
 - Have been diagnosed with a developmental disability and meet DS system criteria.”¹⁸
- For the IRR data base, the dsto.com website serves both the public and professionals (DS agencies). Currently the professional pages are available to DS agencies only to view information. Since the DSTO website is to be used to ‘house’ data from Child Welfare agencies and the Special Needs team, the administrator function has been modified to include discrete sections for each of the four Toronto child welfare agencies and for the Special Needs team, as discussed above.¹⁹
- For the IRR data base, Agency Administrators (Agency + Integrated Response Consultant) – have access to only their **own** Agency database information, program information, events, resources and families for whom they provide IRR Consultation. They are able to View and Modify information.²⁰

¹⁷ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, p. 6.

¹⁸ <http://www.dsto.com/tpadmin/transhelp.php?modify=showHelponform&page=directions>

¹⁹ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, p. 18.

²⁰ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, p. 19.

- For IRR and the Administrative site for DS Agencies, agency Administrators (Agency Access) – have access to only their **own** Agency database information, program information, events, resources, staff user accounts and families whom they are the lead agency for. They are able to View and Modify information.²¹
- Some agencies have now started to enter data into the Transitions Database.

4. Architecture and Data Flows for the Databases

- The Transitions database and the IRR database, though developed by the same developer and contained within the dsto framework, are currently separate entities. The goal is eventually to have the two data systems connected so that, when a teen becomes an adult in the Transitions database his or her information will be transferred to the IRR database. This will have to be consensual in character. At present, the two databases are not linked electronically, but it can be anticipated that they will be linked for practical purposes.
 - The staff and administrators who access the two databases are from different agencies and, to date, they do not have access to both databases. (Only the Project Manager has such dual access.) The staff who work on Transitions access the database with one URL, and the staff who work on the IRR access the database with a different URL. (Both URLs start with www.dsto.com/.)
- The Child Welfare agencies and Special Needs teams have consolidated their data for transitional planning for children in need on the DSTO web site: “Use of the DSTO data base will place data in a secure, shared resource that will facilitate DS system access to planning data.”²²
- The Transitions Database will collect a profile of each youth in care electronically. (See appendix 1 for a comparable list of information being collected).
 - “A new protocol has been developed to support planning and access between Child Welfare agencies (*version II - the Special Needs Team*) and Developmental Services (DS) agencies. The protocol will facilitate the development of a centralized source of information about children, age 14 to 16 who: have a developmental disability, are residing in external per diem placements, and are crown wards or special needs agreements. (*version II receiving services from the Special Needs Team*).”²³
- The Integrated Response process requires that the persons handling inquiries represent not only their organization, but the entire network of developmental services for adults in Toronto. It is an effort to provide coherent, integrated, prompt service to families in need of guidance and assistance.
- “One of the characteristics of the Integrated Response approach is that callers need tell their story only once in order to apply for service. To achieve this end, all Integrated Response Operators will use the same “Integrated Response

²¹ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, p. 19.

²² Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, p. 9.

²³ <http://www.dsto.com/tpadmin/transhelp.php?modify=showHelpform&page=background>

- ²⁴ This record can then be transferred to another agency if required, and with the proper consents.”²⁵
- All IRR calls must be documented to assist in providing simplified, coordinated access to services, and to provide inputs for system wide planning. Each agency may have their own version of call tracking; however, the agreed upon standard is the IRR for Adults, which provides enough detail to support the referral process.²⁶
 - If a caller meets eligibility criteria, he or she is eligible for an access consultation. Having identified the preferred Lead Agency, the Interim Support Consultant is responsible for forwarding copies of the original IRR for Adults and the Access Consultation Form to the person identified as the contact person for Lead Agency.²⁷ A Notification is sent to the contact person requesting they log into the database to pick up the new IRR. A caller may also contact a Lead Agency directly once it has been identified.
 - Appendices 3 and 4 below present data flow charts for the two databases that are the subject of this PIA.
 - An Access Consultation Coordinator is the link between the Integrated Response Operator and a referral to a Lead Agency. The former acknowledges receipt of the request by e-mail to the Operator and gives the request to an Interim Support Consultant, who books an appointment after further consultation with the caller as required.²⁸ The e-mail acknowledgments of receipt in both instances use unique numbers only rather than names, etc. This process uses an Access Consultation Form.
 - Having identified the preferred Lead Agency, the Interim Support Consultant is responsible for forwarding paper copies of the original IRR for Adults and the Access Consultation Form to the person identified as the contact person for Integrated Response within the preferred Lead Agency.²⁹ The notification is to access the electronic information by logging into the IRR database.
 - The Lead Agency is responsible for ensuring that a customized confirmation letter is sent to the individual/family. The letter introduces the client’s Lead Agency, provides the name of the Contact Worker; and confirms registration with the access mechanism(s).³⁰

²⁴ Toronto Development Services for Adults, “Integrated Response Practitioner’s Guide,” (Revised April 11, 2006), p. 17. A Ministry form (*ref: source document To Serve the Children*). This IRR for Adults is the agreed upon standard form for the Integrated Response Approach. (*Ibid.*, p. 58).

²⁵ Toronto Development Services for Adults, “Integrated Response Practitioner’s Guide,” (Revised April 11, 2006), p. 27.

²⁶ Toronto Development Services for Adults, “Integrated Response Practitioner’s Guide,” (Revised April 11, 2006), p. 27.

²⁷ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, p. 34.

²⁸ Toronto Development Services for Adults, “Integrated Response Practitioner’s Guide,” (Revised April 11, 2006), pp. 38-39.

²⁹ Toronto Development Services for Adults, “Integrated Response Practitioner’s Guide,” (Revised April 11, 2006), p. 41.

³⁰ Toronto Development Services for Adults, “Integrated Response Practitioner’s Guide,” (Revised April 11, 2006), p. 42.

- For IRR, individuals 16 years and older, and living with a caregiver that are in need of long-term service coordination, are registered on a coordinated waiting list. Individuals are placed onto the coordinated waiting list by the agency that is maintaining contact with them until a worker can become involved to provide the longer term assistance they require.
- The Community Supports procedure for IRR is as follows:
- 1. Families are asked to sign a consent form, which facilitates the transfer of information between the agency providing interim support and the agency able to provide longer term support.
- 2. Names are placed onto the waiting list using the Coordinated Waiting List Update Form. Guidelines for adding an individuals name to the waiting list are available.
- 3. The completed update form is forwarded to the Community Supports Facilitator, who is responsible for maintaining the waiting list.³¹

³¹ Toronto Development Services for Adults, “Integrated Response Practitioner’s Guide,” (Revised April 11, 2006), p. 43.

Personal Data Collection for the Databases

5. Statutory Authorities for the Collection, Use, and Disclosure of Personal Information for the Databases

- The Transitions and IRR databases are cooperative, joint ventures of four Child Welfare agencies and a Special Needs team that provide developmental services in greater Toronto. The Geneva Centre is the organizing and lead agency in this regard. From a data protection perspective, the originating agencies retain *control* of the personal information that they store in either of these two databases, which are essentially in the *custody* of the Geneva Centre. It is also not apparent what privacy law, if any, covers them for purposes of data protection.
- The four Child Welfare agencies that put personal information into the Transitions database are the *controllers* of the data and responsible for privacy protection.
 - Since *PIPEDA* does not cover “not-for-profit” organizations, it does not apply to the non-commercial activities of these agencies.
 - It may be necessary for these entities to voluntarily agree to comply with Ontario *PHIPA* as a condition of participating in the Transitions and IRR databases, as happens with some participating agencies in the Client Information Management System in use for comparable purposes in Northern Ontario. However, the scope of activities in the north may be more clearly health related and thus amendable to the scope of *PHIPA*.
- It appears likely that none of the agencies which use these two databases are subject to Ontario *PHIPA*. It would be much better for privacy protection and sharing of personal information under controlled conditions if they all were. It also appears that all of these Toronto voluntary agencies are not under any privacy legislation in Ontario, since *PIPEDA* only applies to the collection, use, and disclosure of personal information for commercial organizations.
- DSTO is a web site of the collaborative group of DS agencies in the city of Toronto, which is a public body subject to the Ontario *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*. But the City of Toronto has no direct role with respect to the databases that are the subject of this PIA. It is neither the controller, nor the custodian, for these data.
- The two Ministries that fund the participating agencies are subject to Ontario MFIPPA but they are at arm’s length from these two databases.
- The practitioner’s guide for using the IRR database makes the following statement about confidentiality: “Services provided by an I&R [Information & Referral] should be confidential. Information obtained during an assessment must not be shared with others unless permission has been secured from the person to do so, the person is in danger of harming themselves or others, or when release of information is required by law.”³² The latter is a reference to responding to a subpoena for client records.

³² Toronto Development Services for Adults, “Integrated Response Practitioner’s Guide,” (Revised April 11, 2006), p. 22, available at https://www.dsto.com/upload/The_Practitioners_Guide_-_IR.pdf with controlled access for professionals only.

6. Consent Issues for the Databases

- For the Transitions database, assigned Child Welfare agencies represent crown wards. Child welfare agencies also represent some special needs agreements, where the parents remain the legal guardians. As of 2007, Ontario also has a Provincial Advocate for Children and Youth.³³
- With respect to the Transitions database, the participating agencies rely on information consent obtained at the local agency for inclusion of personal information in it.
- The instructions for Integrated Response Operators for IRR include the following: **‘Sharing of Information and Confidentiality.**
Once information is collected:
Ask the caller if they will give verbal consent to pass along the information to the centralized registry for Access Consultation;....”³⁴

Consent to exchange information contained herein (Individual, Family, Guardian)

In order to assist you in the best possible manner, there will be a need to share this information with another provider to arrange for an access consultation visit. May we have your consent to transmit the information you have just provided us. Someone from one of our 32 partner agencies will be contacting you to set up an Interim Support Visit.

Read list aloud

- The actual form read to a caller says the following:³⁵ The operator is supposed to check the names of organizations not to be contacted. Thirty to forty percent of callers have been in touch with an agency in the past, so they are familiar with these names for the most part.
- The purpose of the list is to help the caller to understand how the Integrated Response Process works. It also helps callers to remember if they have connected with, or are already connected with, any one of the agencies listed.
- If an individual requesting services is not able to give consent, because of the nature of the disability, the guardian/parent can (and must) make the decision.³⁶
- The Consent to Release Information (beyond the first consent to have information entered into the database) is completed with an Interim Support Consultant during an Interim Support Visit. The Consent is signed and the Interim Support Consultant then enters the Lead Agency name into the IRR profile in order for the Lead Agency to have access. It would be good practice for the same form to address collection, use, disclosure, and retention of personal information.
- Families or Individuals are asked to sign a consent form for IRR, which facilitates the transfer of information between the agency providing interim support and the agency able to provide longer term support.

³³ See http://provincialadvocate.on.ca/main/en/about/meet_chief.html

³⁴ Toronto Development Services for Adults, “Integrated Response Practitioner’s Guide,” (Revised April 11, 2006), p. 36.

³⁵ https://www.dsto.com/prof/upload/SIR_For_Adult_Form.pdf

³⁶ https://www.dsto.com/upload/Direction_for_completing_SIR.pdf (April 1, 2008)

7. Personal Information Collected for the Databases

- For the Transitions Database, appendix 1 contains a listing of personal information to be transmitted and collected. There is also a database intake profile form on www.dsto.com/tpadmin, which collects about the same information.
 - Staff are instructed that before data are entered to the on-line form, a formal assessment must be in place to confirm the diagnosis and eligibility of each individual for adult DS system services using DS system criteria. You will be required to enter the date of that assessment to the on-line form.³⁷
 - The profile form provides guidance upon request and drop down boxes for selection purposes.³⁸
 - Limited identifying information collected includes date of birth, first and last initials, and gender. The descriptive statement, “non-identifying information” is problematic, since the only limit on re-identification is the lack of data bases readily available for matching purposes. However, “[t]his data will appear only on the file in your agency’s section of the data base. The DS system will assign a Unique Identifier to each file. The unique identifier will be used in all reports.”³⁹ This is simply a sequential record of documents received.
 - The staff person entering this information is asked to state his or her agency, name, and e-mail address.⁴⁰ In terms of the privacy rights of staff, such “contact” information is generally excluded from the scope of protected personal information.
 - The form includes the Postal Code of the individual’s current residence and the individual’s first language.
- The IRR fields on the professional component of the dsto.com web site outline the information being collected on the family or individual who make a service inquiry.
- The Integrated Response Record for adults collects the full name of the person requiring assistance plus other standard demographics.⁴¹
- For IRR for adults, each individual requesting services and supports is assigned a Unique Identifier. This is used on www.Resday.ca and is non-identifying. A search of www.Resday.ca base by the administrator (*see Integrated Response Contact List*) can be done to determine if a person is known to the Toronto Developmental Services sector. In some instances, where a person has not registered for Residential or Day supports, they may still be connected through Respite or other service areas. The Unique Identifier is made up of: Birth Year |

³⁷ <http://www.dsto.com/tpadmin/transhelp.php?modify=showHelponform&page=directions>

³⁸ See the form at <http://www.dsto.com/tpadmin/transitionsdbspec.php?modify=add>

³⁹ <http://www.dsto.com/tpadmin/transhelp.php?modify=showHelponform&page=section1-11>

⁴⁰ <http://www.dsto.com/tpadmin/transhelp.php?modify=showHelponform&page=section2-21>

⁴¹ See https://www.dsto.com/prof/upload/IRR_For_Adult_Form.pdf

Month | Day and First | Last Initials.”⁴² While it is tempting to discuss the Transitions and IRR databases as unique activities, privacy advocates are wisely concerned about the implications of what they call “function creep,” that is the prospects of invasion of privacy becoming more likely as discrete databases are integrated over time even for authorized purposes, such as complete profiles and case management for particular children or adults in need of developmental services. This is a privacy risk that is manageable with openness and acknowledged responsibilities for privacy compliance.

8. Limits on Personal Data Collected for the Databases

- The data collected for Transitions are only the amount and type of data that will be helpful in planning for services for individuals.
- The data collected for the IRR are minimal based on the information required in order for Interim Support Consultants to contact individuals on the basis of information that tells them what the family is looking for in relation to a service or information. For the IRR database, the caller’s eligibility also determines the level of personal information that is collected. If a file is created, the printable version of the IRR then becomes a cover page for the Lead Agency.
- As a general matter, the two databases only collect enough personal information to connect applicants for services to the service requested. Additional personal information is subsequently collected and used in the course of actual service delivery.

9. Location of Personal Data Collected for the Databases

- The Geneva Centre is the overall host of the Transitions and IRR databases and has custody but not control over the personal information in them.
- The DSTO website is being physically hosted in a secure location on the Internet by NetAccess Systems Inc. in Hamilton, Ontario; the data bases are housed in servers at their location.⁴³
- NetAccess makes the following statement on its website: “While every reasonable effort is made to ensure the privacy of your material, NetAccess does not guarantee privacy of your data, e-mail, or transmissions. For those to whom privacy is a vital issue, we advise that they use methods such as encryption to ensure privacy.”⁴⁴

⁴² Toronto Development Services for Adults, “Integrated Response Practitioner’s Guide,” (Revised April 11, 2006), p. 58.

⁴³ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, p. 18. See also <http://www.nas.net/services/nethost.phtml>

⁴⁴ <http://www.nas.net/about/policies.phtml> The web site for this company also does not contain a Privacy Policy.

10. Data Retention/Destruction for the Databases

- Plans for the retention, archiving, and destruction of these electronic data are still in the developmental process.

11. Access Rights for Individuals to their Personal Information in the Databases

- As guaranteed under applicable Ontario privacy legislation, individuals have a right of access to, and correction of, their personal information held in these databases.

12. Uses and Disclosures of Personal Information from the Databases

- Data in the Transitions Database will be used by the DS system for planning purposes only, which reflects the purpose for its creation.
 - Administrative staff for the data base will generate reports, which will provide the DS system with information about upcoming needs for system planning, which are already known for these persons. Reports will focus on composite data (e.g. geographic disbursement of placements) rather than on characteristics of individuals. Reports generated for the DS system will be statistical in nature and will not include the limited identifying information submitted within each Profile.⁴⁵
- Data collected for the IRR database are used for referrals to needed services and for crisis management:
 - A Lead Agency contacted for a service continues to develop its record in IRR for Adults to arrange an Access Consultation.
 - In the situation where crisis support is needed, the operator will assist with the connection to the Crisis Network. If the caller prefers to access crisis support directly, the operator will provide the caller with contact information, including the direct telephone number.⁴⁶
 - Even if a caller is not eligible for service, the Integrated Response Operators collect a record in IRR for adults for future reference. The information collected includes what the caller called for (drop down menu includes: developmental services, funding); time spent on the call; and reason why not eligible. The information is collected to track the number of calls that intake are receiving and what people are calling for. Demographics about the caller are not collected.
- The use of personal information for the two databases for reports and other management or statistical materials will only result in material used internally as opposed to published material.
- Proponents do not expect outside requests for access to these data for research purposes.

⁴⁵ Transitions Implementation Working Group, "Report of Detailed Planning for Age-14 Protocol for Ministry Review," September 30, 2007, p. 7.

⁴⁶ Transitions Implementation Working Group, "Report of Detailed Planning for Age-14 Protocol for Ministry Review," September 30, 2007, p. 27.

Privacy Standards and Security Measures for the Databases

13. Privacy Risk Management for the Databases

- The Transitions Database tracks youth only by birth date and initials; there are no names or addresses accessible on line, since that information is not required for the purposes of Transitions, which are limited to planning only, i.e. research and statistical uses of personal information. The database is not used for the direct treatment of any person. Note that the database also includes gender, location, and postal code for each individual.
- For the Transitions Database, access to files will be restricted to :
 - Workers from each Child Welfare agency or the Special Needs team who enter and amend data in their own files only. They may already have access to such personal information in paper files.
 - Administrative staff for the data base (DS system staff – 3 persons) who will access all content in the system for the purpose of updating public information [and professional information], providing technical support, and developing reports for planning purposes.⁴⁷
 - Confidentiality agreements will be put in place, as needed, between administrative staff for the Transitions database and Child Welfare agencies or the Special Needs team. These agreements, along with the security features and access limits of the system, will seek to ensure that information is fully protected. This is particularly important for information from ‘restricted’ files that Child Welfare may put into the system.⁴⁸ Currently, all staff sign confidentiality agreements for each agency. As the processes for transferring information from agency to agency, or from database to database, have not been put in place, additional confidentiality measures have not yet been developed.
- Access to the professional site on the DSTO web site requires a username and a password to view the IRR database. This approach will work for the small number of current users. Access to the IRR database is through the Administrative site, which only the required staff know how to access. Administrative staff of the site manage access controls. Passwords are not changed regularly.
- Each Integrated Response Record that is saved in the database has an ID number that is then used to identify a family/individual in any e-mail notifications to specific consultants. The ID number is included in the notification to the Interim Support Consultant and Lead Agency so that they can know which record to access from the database.

⁴⁷ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, pp. 6-7.

⁴⁸ Transitions Implementation Working Group, “Report of Detailed Planning for Age-14 Protocol for Ministry Review,” September 30, 2007, p. 7.

- Integrated Response Operators must have on-line privacy training available to them.

14. Security Safeguards for Personal Information in the Databases

- NetAccess of Hamilton, Ontario states that the following protecting measures are in place for its hosting of the DSTO web site:
 - This website is on a shared server, but each website is protected by permissions, a user id, and password. An authorized user cannot access the data in any other website.
 - NetAccess has been externally audited on several occasions to ensure that it meets the requirements of financial institutions and eCommerce sites.
 - Physical Security – NetAccess provides [a secure, environmentally controlled computer room environment](#) to house the server where the DSTO website resides. The computer room is kept locked, and it is within the NetAccess offices, which are locked after hours and monitored by a commercial security system with automatic intrusion (i.e., motion) detection as well as environmental monitoring. The entrance to the building is locked after normal business hours, so the servers are actually behind three locked doors.
 - Environmental Security – The computer room has dual air conditioners. Computer room equipment is connected to APC UPS equipment, which provides approx 30 minutes of backup power. In the event of a complete power failure, there is an automatic switchover (after one minute) to a rooftop generator powered by natural gas that will provide continuous power for as long as required.
 - Internet Security – NetAccess maintains dual 100 Mbps Internet connections with automatic failover. All access is through state-of-the-art Cisco routers and switches that provide firewall services. Automatic intrusion detection and prevention are provided on dedicated servers at client request.
 - Staff – There are 10 staff at NetAccess. All are locally based and have worked for NetAccess for several years. All are required to sign Confidentiality Agreements and Conflict of Interest statements. Only staff who are required to work on the servers have Administrator access to the servers.
 - Data Protection and Backup – As noted above, website access is controlled by User id and Password. Only site owners and NetAccess system administrators have access to the website content. Website data are backed up daily to an offsite location. Full backups are done once a

week, and incremental backup are done daily. RAID technology is used on all servers to prevent data loss from disk hardware failures.⁴⁹

- For the DSTO website, including the two databases that are the subject of this PIA, security and confidentiality of files are assured by encryption and by limits on access to information. Each DS agency has access only to information entered by its staff. Information is encrypted and protected by a security certificate. Information stored on website is backed up once a week. The secure certificate encrypts information transmitted between the web server and the user's browser.⁵⁰
- Each agency has a separate log on facility for the DSTO web site, which only permits it to access its own clients.
- Staff entering profiles of individuals on the Transitions Database are instructed that "Information that you enter to this on-line form will be transmitted to a secure and confidential data base in the DS sector. Each Child Welfare agency (*version II – the Special Needs Team*) will have its own discrete section in the data base."⁵¹
- dsto.com has purchased a secure certificate through Thawte, which is registered with dsto.com and used on the website.⁵² The certificate is used to encrypt information within the Administration section of the website as well as the Professional website. This means that all data transferred between the user and the server while she/he is navigating the website are encrypted.
- One database houses many tables which store website information for dsto.com. All databases are accessible through the Administration portion of the website, which is password protected and also runs behind a secure certificate that causes all data transferred between the server and the user (when they click on a secure page) to become encrypted. The administrative tools allow for website administrators to view/add/modify/delete information from/to tables, including the agency, family, content, events, etc., to name a few.
- The professional side of the dsto.com website gives authenticated professionals the opportunity to input family information that is encrypted through the secure certificate before it is transmitted to the server.

⁴⁹ Communication, NetAccess to Tatjana Smrekar, November, 2008.

⁵⁰ Transitions Implementation Working Group, "Report of Detailed Planning for Age-14 Protocol for Ministry Review," September 30, 2007, p. 18. See <http://www.thawte.com/ssl-digital-certificates/ssl123/index.html>

⁵¹ <http://www.dsto.com/tpadmin/transhelp.php?modify=showHelponform&page=directions>

⁵² http://www.thawte.com/digital-certificates/?sl=t29520223630313007&set=b054455&gclid=CN2toK7gnZcCFRxNagodyUoK_g

Conclusions: A Privacy Report Card for the Databases

- At present, the participating agencies are building the Transitions and IRR databases in a privacy vacuum, which will be remedied in the course of completion of this Privacy Impact Assessment.
- There is inadequate evidence at present about the privacy risk management practices in place for either of the two databases or for the thirty-two participating agencies.

Accountability for Personal Information

- The Geneva Centre and the other participating agencies are accountable for the collection, use, disclosure, and retention of personal information that is used for purposes of the Transitions and IRR databases. It is not yet clear whether this is a legal or a moral and ethical responsibility. Completion of this PIA will clarify this situation and indicate how privacy risk management needs to be strengthened across the board for purposes of ensuring compliance with the standard privacy rules incorporated in the “national privacy standard.”⁵³ This privacy report card is organized around these ten privacy principles.
- The Geneva Centre for Autism, for example, does have a privacy policy.⁵⁴

Openness about Personal Information Policies and Practices

- The existence of the dsto web site, and its contents, is generally available to the interested public, not least by logging on to it.
- Persons whose personal information is entered into the Transitions or IRR databases need to be informed of their existence and purposes.

Identifying Purposes for Personal Information

- Persons whose personal information is entered into the Transitions or IRR databases need to be informed of their existence and purposes.
- The “statements of information purposes” of individual participating agencies should include language that covers the uses of personal information for research and planning purposes.

Consent for Personal Information

- Participating agencies manage a standard consent process when they collect personal information for purposes of Transitions and IRR.

⁵³ This is a general reference to the Canadian Standards Association’s Model Privacy Code, which was subsequently incorporated in *PIPEDA*, Schedule 1, and given the force of law for the private sector in Canada (except when there is provincial legislation). Ontario does not have such provincial legislation for the private sector.

⁵⁴ See <http://www.autism.net/content/view/37/99/>

Limiting Collection of Personal Information

- The Transitions and IRR databases collect very limited personal information for very specific purposes. They do not contain comprehensive case records, such as the participating agencies maintain on these respective clients.

Limiting Use, Disclosure, and Retention of Personal Information

- Data from the Transitions database are only used for planning and administrative purposes, not the direct delivery of care to a client.
- Data from the IRR database are only used to try to connect person in need to a required developmental service.

Ensuring Accuracy of Personal Information

- For the Transitions database staff of the four Child Welfare agencies, or on the Special Needs Team, do the data entry from records already in their possession. This information is for planning purposes only.
- The IRR database collects personal information directly from the person requiring services, or a parent/guardian, which helps to ensure accuracy. The information can also be confirmed as the caller moves through the planning and referral process.

Safeguards for Personal Information

- Information presented above from NetAccess and the developer of the dsto website document the reasonable security safeguards in place.

Individual Access to Personal Information

- As guaranteed under applicable Ontario privacy legislation, individuals will have a right of access to, and correction of, their personal information held in these databases.

Challenging Compliance with the Privacy Policy

- Each of the participating agencies has a process in place to respond locally to privacy complaints.

Summary of Recommendations for the Transitions and IRR Databases

- As the lead agency for the Child Welfare Transitions database and the Integrated Response Records database, the Geneva Centre should send this Privacy Impact Assessment to the Office of the Ontario Information and Privacy Commissioner for comments and suggestions. It is important in terms of relations with the public, the government, and the media, that this Office be aware of significant activities related to personal information use in the Developmental System.
- Each of the agencies using either or both of these databases should use this PIA for purposes of privacy training, especially for active users of the systems.
- Proponents of these two databases should anticipate the need for electronic access to the records in them by individuals and/or parents, custodians, and guardians of the children and youth involved.
- Everyone involved in the collection, use, and disclosure of personal information for these two databases should have basic and periodic privacy training, preferably on-line.
- Plans for the retention, archiving, and destruction of these electronic data are still in the developmental process; they should be finalized to the extent possible.
- Users of these two databases should be required to sign meaningful confidentiality agreements at their home agency, with accompanying Frequently Asked Questions (FAQs), which can cover all authorized collection, use, disclosure, and retention of personal information and data sharing.
- Authorized users should be required to change their passwords regularly on the basis of sophisticated rules for permissible choices of passwords.
- Persons whose personal information is entered into the Transitions or IRR databases need to be informed of their existence and purposes.
- The “statements of information purposes” of individual participating agencies should include language that covers the uses of personal information for research and planning purposes.
- In general, the proponents of the dsto process are supportive of each of these recommendations.

Appendix 1: PROFILE OF INFORMATION TO BE TRANSMITTED TO THE DS SYSTEM for the Transitions Database

Source: Transitions Implementation Working Group, "Report of Detailed Planning for Age-14 Protocol for Ministry Review," September 30, 2007, Appendix B.

Date of Submission _____

1. UNIQUE IDENTIFIER

(year, month, day, initials, gender – e.g. 19951002jgf)

2. REFERRAL CONTACT INFORMATION

Agency:

Case Manager:

Phone:

e-mail:

2.1 Who has custody of the child?

Mother Father Both CAS CCAS JCFS NCFS
 Other (please specify) _____

3. BACKGROUND

3.1 Please indicate level of Developmental Disability

Borderline Mild Moderate
 Severe Profound Unknown

3.2 Formal diagnosis(es) of Developmental issues

✓	Diagnosis	Type of Assessment on file (e.g.: Psychologist, Hospital Specialist, Medical Doctor, School Board)	Date of Assessment
	Downs Syndrome		
	Intellectual Disability		
	Autism Spectrum (including Aspergers Syndrome)		
	Prader Willi Syndrome		
	ABI		
	ADD/ADHD		
	Fetal Alcohol Spectrum (FAS)		
	Fragile X Chromosome		
	Seizure Disorder		
	Other (please specify)		

3.3 Additional issues that may impact long-term planning

Are special accommodations or additional supports currently required for:

- Physical Health
- Emotional Health
- Hearing
- Vision
- Accessibility requirements
- Behavioural Issues
 - Aggression toward others
 - Inappropriate sexual behaviour
 - Pica
 - Self-harming behaviour
 - Other significant behavioural issues

3.4 Current Connections To Specialized Services

	Agency	Nature of Involvement (e.g. case management, assessment service, treatment services)
1		
2		
3		
4		
5		

4. RESIDENTIAL INFORMATION

4.1 Where does the child currently reside?

- Group Home
 Foster Home
 Foster Home with additional staff
 Individualized Program
 Other (please specify) _____

Name of Agency currently providing the residential service: _____

Closest city/town to the site where child currently resides: _____

Date of first admission to the above resource: _____

4.2 Projected change in location

If current residence is outside Toronto Region, is a future move to Toronto anticipated or desired?

- Yes No Unknown

5. EDUCATION

5.1 Current status of schooling

Is the client attending school? Yes No Unknown

Type of program: _____

5.2 Language considerations

What is the child's first language: _____

Fluency in English: Yes No Unknown

6. FAMILY INVOLVEMENT

	Family Member	Nature of Involvement (e.g. frequency, supervised or unsupervised)
1		
2		
3		
4		
5		

6.1 Languages spoken in the family

Specify _____

Interpreter needed by family members Yes No Unknown

6.2 Religious/ Cultural Considerations Yes No Unknown

If yes please explain: _____

7. PROJECTED NEEDS

7.1 Residential options Yes No Unknown

7.2 Day options Yes No Unknown

7.3 Preferred location in Toronto

North South East West No preference Unknown

Transitions Profile - Intake Form – Database Copy

Source: <https://www.dsto.com/tpadmin/transitionsdbspec.php?modify=prnTransitionsdb>

Transitions Profile - Intake Form

Date of Data Entry

Section 1. NON-IDENTIFYING INFORMATION

*Enter the date of birth, first and last initials, and gender

Section 2. CONTACT INFORMATION

Agency entering data to the data base

Agency _____

*Children's Services Worker _____

*Phone _____

*Email _____

*Who has custody of the child?

Check the appropriate box(es) from the drop down list

Mother

Father

Both

CAS

CCAS

JCFS

NCFS

Other

If other, please specify

Section 3. BACKGROUND

*Please indicate level of assessed Developmental Disability from the drop down list.

Mild

Moderate

- Severe
- Profound
- Unknown

*Please indicate the type of professional who made the above assessment from the drop down list and type in the date of the assessment

- Pediatrician
- Geneticist
- Neurologist
- Psychologist
- Psychiatrist
- Other

If other, please specify

Date of assessment

*Please identify any conditions that may impact long-term planning from the drop down list

- Acquired Brain Injury
- Asperger
- Attention Deficit Disorder (ADD)/
Attention Deficit Hyperactivity Disorder (ADHD)
- Autism Spectrum Disorder
- Downs Syndrome
- Prader Willi Syndrome
- Fetal Alcohol Spectrum Disorder (FASD)
- Fragile X Chromosome
- Seizure Disorder
- Other

If other, please specify

*Please check any of the following areas where special accommodations or additional supports are currently required from the drop down list

- Physical Health
- Emotional Health
- Hearing
- Vision

- Accessibility requirements
- Behavioural Issues
- Behavioural Issues: Aggression toward others
- Behavioural Issues: Inappropriate sexual behaviour
- Behavioural Issues: Pica
- Behavioural Issues: Self-harming behaviour
- Behavioural Issues: Other significant behavioural issues
- Unknown

Please check any of the following areas where connections to specialized services are currently in place

- Occupational Therapy Service
Name and location (city or town) _____
- Behaviour Therapy Service
Name and location (city or town) _____
- Physiotherapy Service
Name and location (city or town) _____
- Speech and Language Therapy Service
Name and location (city or town) _____
- Dietitian
Name and location (city or town) _____
- Psychiatrist
Name and location (city or town) _____
- Other
Name and location (city or town) _____

Section 4. RESIDENTIAL INFORMATION

In what type of residential resource does the child currently reside (check one option from the drop down list)?

- Group Home If other, please specify
- Foster Home _____

- Foster Home with Additional Staff
- Individualized Program
- Other

Enter the date of the first admission to the above resource

Enter the name of Agency that is currently providing the residential service

Enter the postal code of the child's current residence

Indicate the Region where the child currently resides

- Central East Region
- Central West Region
- Eastern Region
- Hamilton/Niagara Region
- Northern Region
- North Eastern Region
- South East Region
- South West Region
- Toronto Region

If child's current residence is outside Toronto Region, is there any reason that a move to Toronto Region would not be considered when the child is moving to the adult service system?

- Yes
- No
- Unknown

Section 5. EDUCATION AND LANGUAGE

*Is the child currently attending school?

- Yes
- No
- Unknown

*If yes, is the school program

- Segregated
- Non-Segregated

*What is the child's primary form of communication

- Augmented Communication
- Gestures
- Non verbally
- Pictures
- Sign language
- Verbally
- Other

If other, please specify type of residence

*What is the child's first language

- AFG AME ARA ARM ASS BEN Chinese English EST
- Filipino French German GRE GUJ Italian Japanese Korean
- MAL Mandarin ORM Other PER Portuguese Punjab Russian
- SER Spanish TAG TAM Turkish Ukranian URD VIE

Section 6. FAMILY INVOLVEMENT AND BACKGROUND

Please indicate which family members currently have contact with the child. For each family member who has current contact, indicate whether it is supervised or unsupervised, and the frequency.

Mother

Are contacts

- Supervised
- Unsupervised

Frequency

- Weekly
- Monthly
- Less Frequently

Father

Are contacts

- Supervised
- Unsupervised

Frequency

- Weekly
- Monthly
- Less Frequently

<input type="checkbox"/> Grandmother	Are contacts	<input type="checkbox"/> Supervised
		<input type="checkbox"/> Unsupervised
	Frequency	<input type="checkbox"/> Weekly
		<input type="checkbox"/> Monthly
		<input type="checkbox"/> Less Frequently
<input type="checkbox"/> Grandfather	Are contacts	<input type="checkbox"/> Supervised
		<input type="checkbox"/> Unsupervised
	Frequency	<input type="checkbox"/> Weekly
		<input type="checkbox"/> Monthly
		<input type="checkbox"/> Less Frequently
<input type="checkbox"/> Sibling(s)	Are contacts	<input type="checkbox"/> Supervised
		<input type="checkbox"/> Unsupervised
	Frequency	<input type="checkbox"/> Weekly
		<input type="checkbox"/> Monthly
		<input type="checkbox"/> Less Frequently
<input type="checkbox"/> Other family member	Are contacts	<input type="checkbox"/> Supervised
		<input type="checkbox"/> Unsupervised
	Frequency	<input type="checkbox"/> Weekly
		<input type="checkbox"/> Monthly
		<input type="checkbox"/> Less Frequently

Please indicate family member

Indicate what language is spoken by the family members who have contact with the child's

<input type="checkbox"/> AFG	<input type="checkbox"/> AME	<input type="checkbox"/> ARA	<input type="checkbox"/> ARM	<input type="checkbox"/> ASS	<input type="checkbox"/> BEN	<input type="checkbox"/> Chinese	<input type="checkbox"/> English	<input type="checkbox"/> EST
<input type="checkbox"/> Filipino	<input type="checkbox"/> French	<input type="checkbox"/> German	<input type="checkbox"/> GRE	<input type="checkbox"/> GUJ	<input type="checkbox"/> Italian	<input type="checkbox"/> Japanese	<input type="checkbox"/> Korean	
<input type="checkbox"/> MAL	<input type="checkbox"/> Mandarin	<input type="checkbox"/> ORM	<input type="checkbox"/> Other	<input type="checkbox"/> PER	<input type="checkbox"/> Portuguese	<input type="checkbox"/> Punjab	<input type="checkbox"/> Russian	
<input type="checkbox"/> SER	<input type="checkbox"/> Spanish	<input type="checkbox"/> TAG	<input type="checkbox"/> TAM	<input type="checkbox"/> Turkish	<input type="checkbox"/> Ukranian	<input type="checkbox"/> URD	<input type="checkbox"/> VIE	

Is an interpreter needed by family members?

Yes

No

Unknown

Does the family have faith or cultural considerations?

Yes

No

Indicate whether the family's faith or cultural considerations will impact long-term planning for the child

Yes

No

Unknown

If yes, please provide a brief explanation

Section 7. PROJECTED NEEDS

*Do you anticipate that the child will need Residential Support in the future?

Yes

No

Unknown

*Do you anticipate that the child will need Day Support in the future?

Yes

No

Unknown

*What is the preferred location (if any) in Toronto when the child is transitioning to adult Developmental Services in Toronto Region?

North

South

East

West

No preference

Not known

Appendix 2: Consent to Release Information through the Integrated Response Network to Lead Agencies

Source:

https://www.dsto.com/upload/CONSENT_TO_RELEASE_INFORMATION.pdf

CONSENT TO RELEASE INFORMATION THROUGH THE INTEGRATED RESPONSE NETWORK TO LEAD AGENCIES

I,

(Full Name)

of

(Address)

Hereby give permission for the exchange of information concerning (Individual's Full Name and Date of Birth) only between any of the following Integrated Response Network agencies for the purpose of identifying the agency most appropriate to provide the supports being requested.

Addus Harmony Place Participation House

Bob Rumball Centre for the Deaf JVS Toronto Pegasus

Christian Horizons Kerry's Place Autism Svcs Reena

Community Living Toronto L'Arche Safehaven

CORE Mary Centre St Vincent de Paul

Common Ground Cooperative Meta Centre Salvation Army

COTA Health Montage Support Svcs Surrey Place

Family Services Association Muki Baum Treatment Ctr Surex

Geneva Centre New Leaf Vita

Griffin New Visions Toronto Woodgreen Community Svcs

Operation Springboard York Community Services

This consent is valid for 12 months from the date it is signed unless the person who signed withdraws it earlier.

The purpose of this consent was explained to me by _____ and I fully understand and consent to what is being asked of me.

Signature of Applicant or Witness

Substitute Decision Maker

Relationship to Individual Date

(If substitute Decision Maker)

Feb 07

Instructions for Completion of this Form

1. The full name, address & date of birth being requested are those of the individual applying for service

2. Strike out the agencies that the individual does not want to receive their information.

3. The person giving authorization to disclose the information must be mentally capable of making the decision. The following guidelines may be helpful:

Persons aged 16 or over may be presumed capable of authorizing the release of confidential information about themselves, unless there are reasonable grounds to question this presumption.

Authorization for the release of confidential information about persons unable to sign must be obtained from a parent, guardian or substitute decision maker.

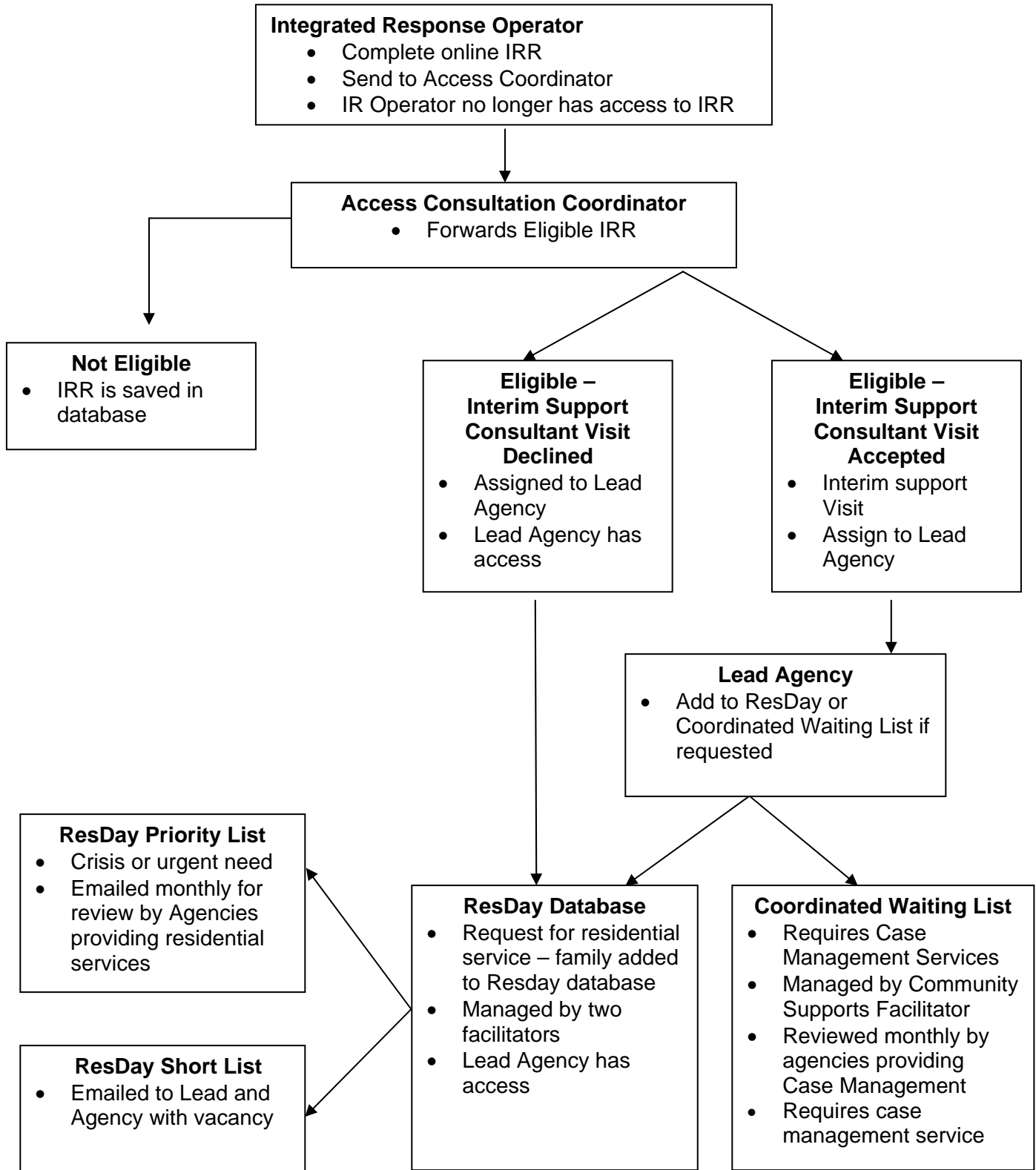
4. It is necessary to obtain authorization from all capable persons currently 16 or older before releasing their confidential information.

5. Authorization must be in writing and contain the signature of the subject of the information, or the legal representative or guardian of the subjects, as well as the signature of a witness.

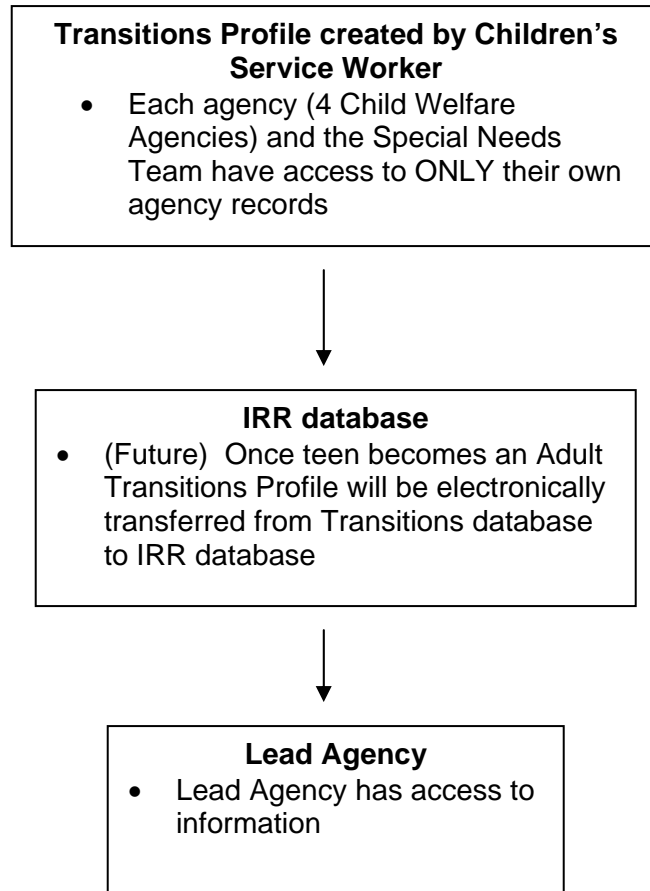
6. The service provider may serve as a witness.

7. For a person who is not capable of making the decision to disclose the information, the name and address should be that of the substitute decision maker. The name and date of birth remains that of the individual applying for service.

Appendix 3: Data Flow Chart for the Integrated Response Record



Appendix 4: Data Flow Chart for the Transitions Database



Appendix 5: The Consultant: David H. Flaherty

David Flaherty is a specialist in the management of privacy and information policy issues. He served a six-year, non-renewable term as the first *Information and Privacy Commissioner for the Province of British Columbia* (1993-99). He wrote 320 Orders under the *Freedom of Information and Protection of Privacy Act* and also pioneered the development of site visits to public bodies (hospitals in particular) as a form of privacy auditing.

Flaherty began his involvement with privacy issues as an assistant to Alan F. Westin at Columbia University in 1964. Flaherty's first book was **Privacy in Colonial New England** (1972). In 1974 he started comparative public policy work in Europe and North America that led to a series of books, including **Protecting Privacy in Surveillance Societies: The Federal Republic of Germany, Sweden, France, Canada, and the United States** (1989). Flaherty has written or edited fourteen books.

Flaherty is an Honours graduate of McGill University (1962) and has an MA and Ph.D. from Columbia University. His teaching career from 1965 to 1993 included Princeton University, the University of Virginia, and the University of Western Ontario, where he was professor of history and law from 1972 to 1999 and is now professor emeritus. He was the first director (1984-89) of its Centre for American Studies. He has held fellowships and scholarships at Harvard, Oxford, Stanford, and Georgetown Universities. In 1992-93 Flaherty was a Fellow of the Woodrow Wilson International Center for Scholars in Washington, DC and a Canada-US Fulbright Scholar in Law. Flaherty was an adjunct professor in political science at the University of Victoria from 1999 to 2006.

As a consultant, Flaherty's services for clients include strategic advice on the management of privacy issues and of relationships with privacy authorities, privacy advocates, and the general public; conducting overall assessments of privacy compliance (privacy reviews, audits, site visits, knowledge transfer); preparing Privacy Impact Assessments; helping to manage privacy breaches; and developing privacy risk management plans.

With Stephanie Perrin, Heather Black, and Murray Rankin, Flaherty is a co-author of the [Personal Information Protection and Electronic Documents Act: An Annotated Guide](#) (Irwin Law, Toronto, January, 2001). He also co-authored the [Guidelines for Managing Privacy, Data Protection and Security for Ontario Hospitals](#) (A Report prepared by the Ontario Hospital eHealth Council's Privacy and Security Working Group – July 2003). www.oha.com

Flaherty is a member of the External Advisory Committee to the Privacy Commissioner of Canada since its inception in 2004. Since 2000, he has been the Chief Privacy Advisor to the Canadian Institute for Health Information (CIHI).