



# Connections Early Years Family Centre

## Privacy and Protection of Personal Health Information Policy Statement for Children and Their Families

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### ***Your Privacy Is Important***

**Connections Early Years Family Centre** is committed to ensuring your confidentiality and protecting your privacy and personal health information, which is shared with us for the purpose of providing a community service. We manage all of your information in accordance with the **Personal Health Information and Protection Act, 2004**, and other applicable laws. This policy document provides general information about our policies and procedures with respect to collecting, using, disclosing and maintaining personal information.

This policy applies to Connections and their contractual partners who may provide services to you on our behalf.

### ***Types of Personal Health Information We Collect***

**Personal Health Information** is a term used to refer to information that can be used to distinguish or identify an individual.

The type of personal health information we collect varies depending upon the nature of your relationship with Connections.

**For children and their families** the types of personal health information we **may** collect includes the name of the parent or legal guardian, the children's names and dates of birth, the role of each family member of the child receiving services (primary, secondary caregiver and care recipient), address and phone number,

email address of each caregiver and care recipient, gender of child receiving services, marital status of caregiver and other family members, service language, any other Healthy Child Development program the child is affiliated with, other agencies involved with the child, pregnancy details, household income, health history of the child, past history and current social and physical needs of the child and other health related concerns, for example, allergies and medications.

## ***Purposes of Collecting, Using and Disclosing Personal Health Information***

We will identify the purposes for which information is being collected before or at the time of collection.

We will collect, use and disclose only as much personal health information is needed to achieve these purposes.

Personal Health Information may be used only for the purposes for which it was collected except with your consent or required by law.

Personal Health Information is required through contractual agreements by the Ministry of Children and Youth, the City of Windsor and other funders from time to time. The information is normally termed Data.

**For children and their families** we collect, use and disclose personal health information for the following primary purposes:

- To provide Preschool Speech and Language service
- To provide Infant Hearing Program service
- To provide Blind Low Vision Program service
- To provide Ontario Early Years Program service and associated funded programs
- To complete our statistical collection requirements
- To conduct quality improvement and risk management activities

**For children and their families** we do not share or disclose personal health information with anyone outside of Connections without obtaining consent from you (or the consent of another person who is lawfully entitled to give, withhold or withdraw consent on that person's behalf). It is reasonable to imply that families who accept service have given their consent.

Our processes for obtaining consent for the disclosure of personal health information are in keeping with legal and professional requirements. Obtaining the appropriate consent for the release of information typically includes ensuring your awareness and agreement to:

- The nature of the personal information to be disclosed
- The manner in which the personal information will be disclosed
- The purpose of the disclosure
- The person or body to whom the personal information will be disclosed
- The time frame for which the release of information permission is active

**Exceptions** to typical consent procedures occur only as required or permitted by law and professional and ethical standards:

- In situations of suspected child abuse or neglect
- In situations of imminent harm
- In situations where mandatory reporting by employers to professional regulatory bodies is legislated
- In the context of legal proceedings to comply with a summons or order issued by a person with jurisdiction to compel the disclosure

You can withhold your consent to the collection, use or disclosure of your personal health information and consent will not be implied and your refusal accepted. You have the right to withdraw your consent to the collection, use and disclosure of personal health information at any time unless the collection, use and disclosure is required or permitted by law.

We will fully inform you of the consequences if consent is declined or withdrawn.

## ***Ensuring Accuracy***

Connections will make every effort to ensure the information we collect is accurate, complete and up to date. You have the right to challenge the accuracy of the information. Connections can accept changes to information verbally that would include address and contact information changes. The changes are made upon request and the historical information is maintained. If you wish to challenge the accuracy of personal health care information and/or the completeness of records you must put your request in writing via [office@smflc.ca](mailto:office@smflc.ca) or another form of written communication. No part of the original information will be altered or destroyed by Connections until the time of disposal.

## ***Access to Personal Health Information***

Connections will provide access to personal health information to persons who are lawfully entitled to give, withhold or withdraw consent and will give full consideration to requests within a reasonable time frame. Please contact the Privacy Officer at [office@smflc.ca](mailto:office@smflc.ca) for your request.

## ***Safeguards and Security***

Connections personnel are trained in the need for privacy and confidentiality. They are also trained in our centre's privacy and confidentiality policies and procedures, including the prevention of record loss and unauthorized access.

Personal health information may be stored in paper and/or electronic forms. All information is protected by physical and electronic security measures appropriate to the nature of the information, and is accessible only by authorized personnel. In the event that personal health information is stolen, lost or improperly accessed, the individual to whom the information pertains (or the person who is lawfully entitled to give, withhold, or withdraw consent on that person's behalf) will be notified.

## ***Retention and Disposal of Personal Health Information***

Connections will retain your personal health information for as long as necessary for the fulfillment of those purposes and/or to comply with legal and contractual requirements. The information will be retained in accordance with our retention policy.

For children and their families the personal health information will be shredded to protect your identity.

Family information for the Infant Hearing Program, Preschool Speech and Language Program and the Blind-Low Vision Program will be retained for ten years after the child turns eighteen. Family information for Ontario Early Years Programs is retained for three years.

## ***Policy Review and Amendments***

Connections will review and amend policies and procedures on an on-going basis in order to ensure we are effective and efficient in protecting your personal health information.

## ***Questions or Concerns***

If you have questions or want to make a complaint about how we protect your personal health information please contact our privacy officer:

Privacy Officer  
Connections Early Years Family Centre  
519-252-9696  
[office@smflc.ca](mailto:office@smflc.ca)

You also have the right to complain to the Information and Privacy Commissioner of Ontario at the address below if you have concerns about our privacy practices or how your personal health information has been handled:

Information and Privacy Commissioner/Ontario

2 Bloor Street East, Suite 1400, Toronto, Ontario M4W 1A8

1-800-387-0073

TDD/TYY: 1-416-325-7539

FAX: 1-416-325-9195

[www.ipc.on.ca](http://www.ipc.on.ca)