

information. If you are capable, you can make your own decisions. However, if you are under the age of 16, there are some additional rules to know.

- If you are not capable, your parent(s) or other official guardian will make decisions for you as your substitute decision-maker.
- If you are capable, you will make your own decisions.
- If you are capable, your parent(s) or guardian will also be allowed to make some decisions about your personal information service records. But they will not be able to make decisions about any records about treatment or counseling to which you alone consented.

We encourage you to ask your worker questions to find out more about privacy and your family.

HOW WE RETAIN AND DISPOSE OF INFORMATION

CPIN is a provincial information management system used by CASs. CPIN is the primary tool for storing information needed to deliver CAS services. CPIN contains information about children and their families who receive child protection services. It also contains information about caregivers and those who seek to provide care to children in need, such as foster parents, adoptive parents and members of a child's extended family.

In CPIN, information is stored in person, case and provider records that are designed to hold the unique information for each service. Person, case and provider records are linked when appropriate to create an overall picture of a client's or caregiver's child protection services.

For our individual and family services, our Matrix Case Management System (Matrix) is the primary tool for storing client information needed for care provision. The Matrix system predates CPIN. Information is about client, worker, service date range, service received, case log details to show all the programs the clients may be involved with in meeting a client's well-being.

We also have some older paper and electronic case files that predate CPIN and Matrix. We keep the information collected because it might be necessary for future cases. We also keep the information because former service recipients may ask to see their records.

When we dispose of client information, we do so securely.

SAFEGUARDS TO MAINTAIN CONFIDENTIALITY

JF&CS uses reasonable physical, technical and administrative safeguards to protect your privacy and to maintain the confidentiality of your information. These safeguards include staff training on privacy, policies and procedures, confidentiality agreements with JF&CS employees, volunteers, and representatives, implement a 'need to know' policy monitored by access controls, controlled access to the premises, firewalls, virus protection, locked filing cabinets, and other security measures.

FOR MORE INFORMATION OR COMPLAINTS

If you would like a copy of our JF&CS Privacy Policy, please click here [www.jfandcs.com/privacy, See Policy # 106] or ask your worker for a copy.

We encourage you to contact us with any questions, concerns or complaints you might have about our privacy practices or non-compliance with privacy laws. You can reach our Manager, Compliance and Privacy at:

Manager, Compliance and Privacy
Jewish Family and Child Service
4600 Bathurst St.
Toronto, Ontario M2R 3V3
Tel: 416-638-7800 ext. 6636 | Fax: 416.638-7422
Email: privacy@jfandcs.com

If you feel that your concerns have not been addressed to your satisfaction or you believe that JF&CS has not complied with Ontario's privacy law (PHIPA & Part X-CYFSA), you have the right at any time to contact or make a complaint to the Information and Privacy Commissioner of Ontario. The Commissioner is the person who has general responsibility for ensuring that privacy laws related to your records are followed. The Commissioner can be reached at:

The Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto, Ontario M4W 1A8 Canada
Phone: 1 (800) 387-0073 or 416-326-3333 in Toronto
Fax: 416-325-9195; www.ipc.on.ca

Jewish Family and Child Service

Central Office and Intake

4600 Bathurst Street | 1st Floor
Toronto, Ontario M2R 3V3
T: 416-638-7800 F: 416-638-7943

Gordon S. Wolfe Branch

365 Bloor Street E, Suite #1904
Toronto, Ontario M4W 3L4
T: 416-961-9344 F: 416-961-9351

York Region Branch | 1 Open Door

9600 Bathurst Street | Suite 242
Vaughan, Ontario L6A 3Z8
T: 905-303-5838 F: 905-303-5892

Jerome D. Diamond Adolescent Centre

196 Keewatin Avenue
Toronto, Ontario M4P 1Z8
T: 416-482-3023 F: 416-482-3014

www.jfandcs.com

info@jfandcs.com | facebook.com/jfandcs

JF&CS strives for inclusivity in all its programs, serving community members of any income, family structure, ability, sexual orientation, gender identity, religious affiliation, level of observance, race, ethnicity, cultural identity and place of origin.



Ontario



United Way
Greater Toronto



UJA FEDERATION
of Greater Toronto



ועידת התביעות
Claims Conference
The Conference on Jewish Material
Claims Against Germany
www.claimscon.org

JF&CS

JEWISH FAMILY AND CHILD
SERVICE OF GREATER TORONTO

NOTICE OF
INFORMATION
PRACTICES
jfandcs.com/privacy

Notice of Information Practices

BACKGROUND

Jewish Family and Child Service of Greater Toronto (JF&CS) is a multi-service social service organization that provides a comprehensive set of individual and family services and operates a children's aid society. JF&CS is committed to protecting individual privacy and maintaining the confidentiality of personal health information (PHI) as well as personal information (PI) that it holds.

JF&CS is a health information custodian under the *Personal Health Information Protection Act, 2004 (PHIPA)* for many of its programs and is governed by that legislation. It is also bound by information protection laws under the *Child, Youth and Family Services Act, 2017 (CYFSA)* in its role as a children's aid society. These two laws govern how PHI and PI may be collected, used and disclosed, as well as rights that clients have concerning their information.

YOUR CHILD WELFARE RECORDS

Your child welfare records may include demographic information about you, your contact information, your adoption, fostering and kinship information, record of visits, the care and support you received during those visits, health history, family history, educational, employment, etc. and information from other providers of care. These records are governed primarily by the CYFSA.

OUR INFORMATION PRACTICES FOR CHILD WELFARE RECORDS

The main purposes for which JF&CS collects, uses and discloses your personal information are to:

- Prevent child abuse (physical, emotional and sexual) and neglect of children under 18 years
- Evaluate risk of harm or actual harm to children and youth
- Assist families in offering supports and services to help keep their children
- Develop a plan of care for children who may be separated from their families for placement through

fostering, kinship service & kinship in care, and adoption

- Share information among children's aid societies if this will assist in providing services
- Educate our staff and students
- Seek your consent (or consent of a substitute decision-maker) where appropriate
- Respond to or initiate proceedings
- Conduct research (subject to certain rules) and compile statistics
- Conduct risk management, training and quality improvement activities
- Fulfill other purposes permitted or required by law

Our collection, use and disclosure (or sharing) of your personal information in child welfare records is done in accordance with Ontario law.

YOUR CLIENT RECORD FOR FAMILY SERVICES

Your client record includes information relevant to your health and may include your date of birth, contact information, health number, health history, family health history, details of your physical and mental health, record of client visits, the care and support you received during those visits, any listed substitute decision-maker, and information from other health care providers. We will dispose of your PHI when no longer needed.

OUR INFORMATION PRACTICES FOR FAMILY SERVICES CLIENT RECORDS

The main purposes for which we collect, use and disclose your personal health information are to:

- Deliver our programs
- Develop a care plan for you
- Be paid or process payments
- Educate our staff and students
- Seek your consent (or consent of a substitute decision-maker) where appropriate
- Respond to or initiate proceedings
- Plan, allow for the analysis, administer and manage our internal operations and programs
- Conduct research (subject to certain rules) and compile statistics

- Comply with legal, regulatory requirements, accreditation requirements, support (on a de-identified basis) funding submissions, and donor reports
- Conduct risk management, training and quality improvement activities
- Fulfill other purposes permitted or required by law

Our collection, use and disclosure (sharing) of your personal health information is done in accordance with Ontario law.

ACCESS TO YOUR RECORD AND CORRECTIONS

With limited exceptions, you have the right to access your record. In certain situations, you may be denied access to some or all of your record (with any such denial being in accordance with applicable law and explained to you).

If you wish to access your record, please call the Intake Department at 416-638-7800.

We make every effort to ensure that all of your information is recorded accurately. Please let us know if there is something that is incorrect. You have a right to ask for a correction to your record if you disagree with what is recorded. In some cases, we will be able to make the requested correction, or otherwise we will ask you to prepare a statement of disagreement to be attached to the record.

OTHER THIRD PARTIES

Sometimes we receive requests for information from third parties such as the police, government agencies and people involved in court cases with our clients. We only give personal information about service recipients to third parties if:

- We have the individual's consent;
- There is a court order, search warrant, or urgent demand for records requiring disclosure; or
- We are legally permitted or required to provide the information.

If you have questions about this, please ask us.

YOUR CHOICES

When you enroll into any of our services or programs, we will seek your consent to share your information with other JF&CS programs you wish to register in, on a need to know basis, in order to provide coordinated and effective service to you. We will not disclose your information to other providers or collect your information from other providers without your consent (unless the law permits us to do so). We will not disclose your information to family, friends or other persons unless you specifically request and consent to such disclosure.

When we require and ask for your consent, you may choose to say no. If you say yes, you may change your mind at any time. Once you say no, we will no longer share your information unless you say so. Your choice to say no may be subject to some restrictions under applicable law and reasonable notice. Also, your choice to say no will not have a retroactive effect. Note that JF&CS may not be able to provide ongoing service support should the extent of the withdrawal of consent significantly interfere with service provision to you.

There are situations where we may collect, use or disclose your personal information or personal health information without your consent, as permitted or required by law. For example, this is the case in situations where it is necessary to eliminate or reduce a significant risk of serious bodily harm; or to fulfill mandatory reporting obligations under other laws such as for child protection.

You have the right to ask that we not share some or all of your client record with one or more of the JF&CS staff members or ask us not to share certain parts of your client record. This is known as asking for a "lockbox". If you would like to know more, please ask us for a copy of our "**Client Lockbox Information Brochure: How to Restrict Access to Your Personal Record**".

When there is a right to consent, you may make your own decisions if you are "capable". You may be capable of making some information privacy decisions and not others. If you are not capable – you will have a substitute decision-maker who will make your information decisions for you. Who can act as a substitute decision-maker and what they have to do is also set out in law.

For children, there is no legal age when you become able to make your own decisions about your personal