

COMMUNITY LIVING DURHAM NORTH

MANAGEMENT OF PERSONAL INFORMATION RE SUPPORTED PEOPLE

Policy No: B-7 (Service Delivery)

Effective Date: October 15, 2008

Last Revision:

Last Review: February 3, 2023

Rationale:

To facilitate the delivery of quality services while respecting the privacy of supported persons.

Policy Statement:

The agency compiles and maintains personal data pertaining to supported people because it would be impossible to deliver quality services without ready access to this kind of information. In doing so, the agency will comply with Ministry regulations and with privacy legislation. Further, personal information will be handled with a level of care and discretion that is consistent with our Vision and Mission Statements.

Senior staff will ensure that comprehensive internal controls are in place and are regularly audited.

Electronic files are protected by appropriate back-up procedures and regularly updated anti-virus software. Also, password protection and limited access rights guard the confidentiality of each supported person.

Approved by: Larry Leonard  
for the Board of Directors

Date: October 15, 2008

COMMUNITY LIVING DURHAM NORTH

MANAGEMENT OF PERSONAL INFORMATION RE SUPPORTED PEOPLE

Procedure No: B-7-1  
**Overall Organization of Files**

Effective Date: October 15, 2008  
Last Revision: May 14, 2021  
Last Review: February 3, 2023

Personal information, related to people receiving support, will be organized in a consistent manner. This policy speaks to how documents are grouped and organized, where they are kept and for how long. The actual list of documents kept is too lengthy and too frequently edited for inclusion here. This list (Form B-1 *Records Management*) runs to some 20 pages. It is updated annually (every January) by a director and it is used by Team Leaders and Admin staff who work directly with files in program sites and in the main office and archives.

All such information will be kept in either:

- A *Primary File* for key information that is kept in the main office and not archived until after death or discharge. Support staff can access Primary Files with the permission of the appropriate Program Manager, but material can only be removed or copied with the approval of a Director. Transmittal to a third party or another agency requires the consent of the person in service or of his/her parent or guardian.
- A *Working File* that is kept in the program site for a period of three years. That is, there should always be the current year's records and complete records for two previous years. Some working files are of little use when they cease to be current – e.g. Support Plans. Others, like Financial Records and Medication Administration Records, become part of the permanent record and are, in fact, legal documents in the sense that they would have to be produced in the event of an inquest.
- *Archived Files*. Our archives are at 243 Union Avenue. Every January, one full year of working files, in each program location, are neatly compiled, by the Team Leader, and transferred to archives. After death or discharge, Primary Files are also archived. Archived material is to be kept for seven (7) years after last entry (i.e. after death or discharge), at which time the files will be shredded. The Director provides approval by signing off on form H-39 "Document Destruction Record," which will then be held indefinitely within the Compliance Department.

Procedure No: B-7-2

**Organization and Management of Primary File**

Effective Date: July 2, 2009

Last Revision: June 14, 2019

Last Review: February 3, 2023

- Every person receiving service will have five Primary Files, for hard copy information, as follows:

#1 DSO - Admission and History

Application for Development Services and Supports - ADSS (Regulatory Requirement)

Accessor Summary Report - ASR (if completed)

Support Intensity Scale – SIS (if completed)

Pre-DSO Applications for Service;

Intake Assessments and key historical records;

Medical History.

#2 Assessments and Communication

Originals of assessments and of other documents compiled by external sources like Lake Ridge Community Support Services;

Letters of concern from families, or related meeting notes, with documented follow-up attached;

Outgoing mail to families.

#3 Financial

Correspondence relating to financial matters e.g. wills, public trusteeship, prepaid funerals;

All Notices of Assessment from Revenue Canada, in cases where CLDN assists the person to file his income tax return. Before filing, these Notices should always be scanned to the person's electronic files (see below).

#4 Identifying Information (unless the person carries his personal I.D.)

Originals of Birth Certificates, Passports and Social Insurance Cards.

#5 Consents

Consent forms for all file inquiries, either to access information from other agencies, or to release information to an outside agency.

At the discretion of the Program Director, certain key information in primary files will also be scanned into an electronic file. Such material will be saved as:

Agency Wide\People who Live at\Program Location\People\Person's Name  
\file name.

An example would be the Notice of Assessment already mentioned, above.

Agency Wide\People who Live at/Lorne/ People/Jane Doe/Financial/*Notice of Assessment, 2010*

Procedure No: B-7-3  
**Organization and Management of  
Working Files**

Effective Date: October 15, 2008  
Last Revision: February 3, 2023  
Last Review:

- The Working file is the sum of the current information regarding a person that is compiled and retained either by e-file or paper.
- As stated above, the hard copy component of the Working File is kept in the program site for a period of three years. That is, there should always be the current year's records and complete records for two previous years.
- While in the program site, paper files for different people are kept separate and all files are kept secure – i.e., either in a locked cabinet or in a locked room.
- Most paper files for people in residential programs will be organized into a series of binders. For further detail around the organization of these files and binders, see Agency Wide/Other Forms/Binder Indexes.
- Every January, hard copy files more than three years old are compiled and forwarded to the Compliance Coordinator for storage in our Archives as detailed in Form B-1 Records Management.
- Every person receiving service will also have a current electronic folder under Agency Wide / People who Live at / Program Location / Person's Name as detailed in Form B-1 Records Management.
- CLDN uses a secure person-centred database (AIMS©) for storing and manipulating the personal data that we collect on supported people to facilitate the provision of high quality supports. AIMS also has the capacity to help measure the quality of the supports we provide.

Documents that were once created by hand and saved as hard copies are now entered daily into the database. It is expected that the database will enable us to work smarter and more quickly while reducing our reliance on paper documents. It will also improve our ability to safeguard the privacy of supported people.

Procedure No: B-7-4  
**Organization and Management of Archives**

Effective Date: October 15, 2008  
Last Revision: February 3, 2023  
Last Review:

- The archives are in a locked storage area at 243 Union Avenue.
- Primary responsibility for maintaining the archives has been assigned to the Compliance Coordinator at 16025 Old Simcoe Road

- All material in the archives pertaining to supported persons is organized by peoples' AIMS file numbers and kept inside metal file cabinets.
- A reference chart is displayed in the Archives room. This chart cross references the names of people to AIMS file numbers and directs one to look in a particular file cabinet.
- Every January, working files that are more than three years old will be taken to 243 Union Avenue. Team Leaders or designates will be responsible for organizing the material into four labelled file folders or boxes, as follows:

	Label	Contents
1.	Jane Doe – Communication – 2011	Meeting Reports.
2.	Jane Doe – Program – 2011	Support Agreements, Outdated treatment plans (BSP, Support Information) Incident Reports, Data Collection Charts.
3.	Jane Doe – Health – 2011	Medication Administration Record, Bowel/Weight/Seizure Charts. Outdated PRN Treatment Guidelines, Controlled Acts
4.	Jane Doe – Financial – 2011	Bank and Spending Records; all related documentation and correspondence.

- Team Leaders or staff designated are also responsible for ensuring that the presentation of these files is orderly in other ways. Forms that are blank should be removed. Where forms have been completed and duplicated, the duplicates should be removed and shredded before transfer.
- Upon death or discharge, all electronic and paper files will be archived and retained for seven (7) years.

Approved by: Glenn Taylor  
CEO

Date: February 3, 2023