

Chatham-Kent Social Housing

Policy Name:	Confidentiality Policy
Contact Officer:	Chatham-Kent Social Housing, 519-351-8573
Date Effective	November 1 st , 2002
Date Certified:	November 1 st , 2002

Reference:

Social Housing Reform Act 2000, 368/01 Sect 21-22

Policy:

Chatham-Kent Social Housing Division employees have access to confidential information by reason of their employment with the Municipality of Chatham-Kent. Employees shall comply with the prescribed standards of the SHRA, 2000 for the collection, use, disclosure and safeguarding of privacy of personal information.

Collection of Information:

1. Personal information may only be collected for purposes relating to the performance of duties under the Social Housing Reform Act, 2000 or the Regulations, or as otherwise authorized by law.
2. Staff must not seek out personal information about tenants or applicants unless it is relevant to their work.
3. Staff collecting personal information shall ensure that the person whose information is being collected is given written notice of:
 - a. the purpose or purposes of the collection;
 - b. the fact that the information may be shared as necessary for the purpose of making decisions or verifying eligibility for assistance under the Act, the Ontario Disability Support Program Act, 1997, the Ontario Works Act, 1997 or the Day Nurseries Act, or as authorized by an agreement under section 163 or 164 of the Act; and
 - c. The name, title, business address and business telephone number of a person who can answer questions and respond to complaints about the collection, use or disclosure of the information.

Prior to conducting any credit, landlord or employer checks, staff must obtain a signed consent form from the applicant or tenant. The consent may be part of the application form or annual declaration of income form.

Protection of Information:

1. The day-to-day administration of applicant, tenant and employee files (including information on databases) must include safeguarding against unauthorized access.
2. Applicant/tenant information must be securely stored and a secure storage facility must be provided for archived applicant/tenant/employee information.
3. Only authorized personnel should have access to records, as required to perform their duties.
4. Databases containing files with personal information must be safeguarded from unauthorized access. Confidential electronic files must be password protected so as to limit access to authorized individuals. Screen-savers should be activated as a means to help protect against unauthorized viewing of confidential information.
5. All staff has a responsibility to supervise and direct visitors to the office appropriately, to prevent against unauthorized access to confidential information.
6. Personal information being disposed of must be shredded.

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Release of Information:

No personal information will be released without the written consent of the individual (e.g. bank cheques, tenant or personal references). When responding to inquiries, staff should limit information provided to the questioner and confirm only the information already provided by the individual.

Staff shall not disclose personal information obtained in the course of their duties except:

1. if the subject individual consents to the disclosure;
2. if an authorized individual gives consent for a person unable to give a valid consent;
3. if the disclosure is authorized by, or is for the purpose of complying with, the Act or a regulation or is authorized by law or to comply with any other legal requirement;
4. for the purpose for which it was collected;
5. if it is made to an individual of the social housing division who needs the record in the performance of their duties;
6. as referred to in section 165 (1) of the Act, as it relates to law enforcement proceedings;
7. in compelling circumstances affecting health and safety of an individual; or
8. In compassionate circumstances, to facilitate contact with the next of kin or designate pertaining to an individual who is injured, ill or deceased.

Breach of Confidentiality:

It is a breach of confidentiality to:

1. Discuss any confidential information, acquired as a result of employment with the Municipality of Chatham-Kent, Social Housing Division, where it may be heard by individuals who are not authorized to have access to that information.
2. Provide confidential information or records to unauthorized individuals.

Leave confidential information in written form or displayed on a computer terminal in a location where it may be viewed by unauthorized individuals