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Personal Information Request Policy

Policy Statement

This policy is designed to outline the process by which Housing Services Division will respond to requests by individuals to access their personal information or “client record” collected through the Homeless Individual and Family Information System (HIFIS).

Purpose

To identify the processes by which City of Hamilton, Housing Services Division will receive and fulfill requests by individual clients seeking access to their personal HIFIS records.

To ensure compliance with responsibilities under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) as well as best practices for data safeguarding and transparency.

Legislative Requirements

Individuals must provide expressed written consent for collection and sharing of their personal information within Hamilton’s Homeless Serving System (see Consent to Share Personal and Health Information with Hamilton’s Homeless Serving System).

In accordance with the [Municipal Freedom of Information and Protection of Privacy Act](#) (MFIPPA), individual clients must be informed of the existence, use, and disclosure of their personal information. Individual clients have the right to request access their personal client records and be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

MFIPPA states that the disclosure of personal information in response to a request from the data subject is not an unreasonable invasion of privacy. Such requests do not require a formal Freedom of Information request. Requests from data subjects for their own personal information will be honoured and fulfilled in accordance with MFIPPA standards.

Requests for HIFIS information from third parties seeking information on people other than themselves will be directed to the City of Hamilton Freedom of Information process via Corporate Services. The exception to this would be in the case where a third party is authorized to act on behalf of an individual

	<p>who has provided consent for the third party to receive information on their behalf. In these cases, the request will be treated as a Personal Information Request as per this policy.</p>
<p>Record Request and Fulfillment Process</p>	<p>An individual may request access to their own personal information collected in HIFIS verbally or in writing to the City of Hamilton Housing Services Division.</p> <p>The client must identify themselves and request access to view the information collected about them in HIFIS.</p> <p>These requests will be directed to the Homeless Policy and Programs Manager who will designate staff to follow up to confirm the client's request. Designated Housing Services staff will follow up with the individual client within one week to confirm their request and outline the process for accessing their record. At this time, staff will query if clients have access to government-issued identification (e.g. citizenship card, status card, driver's licence, health card) and instruct them to bring this identification when they come to pick up their personal record. In cases where clients are not in possession of their personal identification, staff will a) refer the client to ID clinic services b) inform the client that Housing Services staff will establish 2-3 identity verification records based on information in their personal record.</p> <p>Clients will be able to obtain a hard copy print-out of all information contained in their HIFIS client record within 30 days of a confirmed request for said record. In cases where the record cannot be retrieved and made available within 30 days, staff must notify client of the reason for the delay and provide an alternate timeline.</p> <p>To retrieve the client record, the HIFIS coordinator or designate will obtain screenshots of all client information contained in HIFIS. This may include: client vitals and demographic information, housing history, common assessment, case management notes, housing placements, services accessed, service restrictions, etc.</p> <p>All third-party personal information will be redacted (blocked out) to prevent a breach of privacy for individuals other than the client requesting access to their personal information. This includes information pertaining to personal contacts of the client, other persons with whom the client has interacted while accessing services, and staff at agencies providing services. Housing</p>

	<p>Services staff will notify affected agencies named in respective client records prior to releasing information to the client.</p> <p>When the client record is printed and ready for pick-up, staff will contact the client to let them know of its availability and instructions for pick-up. Clients are responsible for attending the Housing Services office within designated hours to obtain the requested record. Designated Housing Services staff will provide the record within a sealed envelope to the client upon proof of identification. Clients will be required to verify identity by showing staff their government-issued identification. In cases where clients do not have access to their government-issued identification, staff will verify identity through a series of identification questions.</p> <p>In instances, where clients have corrections or additions that they would like to make to their record, they will inform any Housing Services staff, who will then inform the Manager of Homeless Policy and Programs.</p>
Applicability	<p>This policy applies to the City of Hamilton, Housing Services Division, as the housing and homelessness service system manager and custodian of HIFIS data. Staff of agencies participating in the Homeless-serving Coordinated Access System are expected to direct client HIFIS record requests to the hifis@hamilton.ca.</p>
Definitions	<p>Aggregate Data: Data collected and consolidated from multiple sources and/or on multiple measures, variables, or individuals typically compiled into data summaries or summary reports for the purposes of public reporting, statistical analysis, and identifying system trends. It does not include identifying data at an individual level nor does it enable identification of individuals whose data is included in the aggregate analysis.</p> <p>Community Entity: Lead decision-making body that coordinates efforts to achieve federal, provincial, and local housing outcomes.</p> <p>HIFIS Client Record: Any information recorded in the HIFIS that can be directly linked to a particular client. This may include services accessed or provided, case notes, housing history and status, common assessment results, and personal details relevant to housing service provision.</p>

	<p>HIFIS Community Coordinator: Community representative or entity recognized by the federal government to be responsible for the coordination, implementation, and ongoing operations of HIFIS as well as for all reporting to the federal government relating to HIFIS.</p> <p>Municipal Freedom of information and Protection of Privacy Act (MFIPPA): This Act requires that local government institutions protect the privacy of an individual’s personal information existing in government records. The Act includes rules regarding the collection, retention, use, disclosure, and disposal of personal information in the government’s custody or control.</p> <p>Non-identifying Data: Information that cannot be used to identify a specific individual.</p> <p>Personal Information: Any recorded information about an identifiable individual, including but not limited to information relating to race, national or ethnic origin, religion, sex, age, medical or psychiatric history, education and employment history, and name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual; “identifying data” has a similar meaning.</p> <p>Retrieval: The process of locating and removing a record or file from storage or accessing information from stored data on a computer system.</p> <p>Service Provider: Organization providing housing supports to homeless individuals or families. Service providers are collectively referred to as Hamilton’s Homeless Serving System.</p> <p>Third-Party Data/ Third-Party Information: Information pertaining to individuals with whom a client in HIFIS has interacted and/or provided information about who have not provided direct consent to be included in the client record.</p>
<p>Accountability</p>	<p><u>Community Entity (CE)</u></p> <p>As CE, the City of Hamilton has been identified by Employment and Social Development Canada as the HIFIS Community Coordinator and has the primary responsibility for HIFIS operations in Hamilton including data management policies and practices, ongoing implementation, training, and support of HIFIS.</p>

	<p>The City of Hamilton is the HIFIS Application Host for all data collected and shared through HIFIS via Service Providers in accordance with the HIFIS Data Sharing Protocol. The City of Hamilton is responsible for ensuring effective data protection and management in compliance with MFIPPA, ensuring both the privacy of an individual’s personal information and respecting individuals’ rights to access and correct their personal information. The City of Hamilton is responsible for managing and processing requests by individuals seeking access to their HIFIS client record.</p> <p><u>Agency Service Providers</u></p> <p>Services Providers will follow policies and procedures for HIFIS use in accordance with the HIFIS Data Sharing Protocol, Common Consent, and Confidentiality Agreement. Service Providers will direct individual clients requesting access to their personal HIFIS record to the City of Hamilton as HIFIS Coordinator.</p>
<p>Related Documents</p>	<ul style="list-style-type: none"> • Hamilton’s Coordinated Access Guidelines • HIFIS Confidentiality Agreement for Service Providers • HIFIS Consent to Share Personal and Health Information • HIFIS Data Sharing Protocol • Hamilton’s Systems Planning Framework • Coordinated Access Policies • Revisioning Coordinated Access: <i>Fostering Indigenous Best Practices Towards a Wholistic Systems Approach to Homelessness</i> • Urban Indigenous Strategy • Hamilton’s Housing and Homelessness Action Plan