



## **NOTICE OF INFORMATION PRACTICES**

Ontario has a law that protects your personal information when you are involved with a service provider such as Milestone Foster Homes. This law is called Part X of the *Child, Youth and Family Services Act, 2017* (the Act). Milestone is required to follow the rules set out in the Act and we are required to keep your information safe and secure. You have the right to know how we may use and give out your personal information. You also have the right to know how you can get access to your information.

We are committed to promoting the privacy of foster children, foster families, staff, contractors, board members, students and volunteers. We protect the confidentiality of the personal information that we hold while ensuring that relevant information is available to authorized parties only.

### **PERSONAL INFORMATION**

Milestone's records may include personal information collected about you. Personal information means any/all identifiable information about a person.

Personal information includes, for example:

- Your date of birth
- Your contact information
- How you were involved with Milestone

- Meetings that you attended
- Physical & mental health information
- Medical information
- Psychological or Psychiatric reports
- Clinical reports
- Other reports
- School information
- Family history
- Financial information
- Employment history
- Allegations
- Court documentation
- Police involvement
- Criminal history
- Your views and opinions
- The views and opinions of others about you

Personal information also includes information about your identity characteristics, such as:

- Race
- Ancestry
- Place of origin
- Colour
- Ethnic origin
- Citizenship
- Family diversity
- Disability
- Creed
- Religion
- Age
- Sex
- Sexual Orientation
- Gender identity
- Gender Expression
- Cultural needs
- Linguistic needs
- Marital status
- Family Status

## **USE AND DISCLOSURE OF PERSONAL INFORMATION**

Milestone will collect, use, and disclose (share) personal information so that we may:

- Provide care for children;
- Assess and approve foster homes;
- Match children to caregivers;

- Plan and manage services;
- Aid law enforcement in an investigation;
- Receive payment or process, monitor, verify or reimburse claims for payment;
- Provide appointment reminders;
- Seek consent (or consent of a substitute decision-maker) where appropriate;
- Conduct risk management, error management and quality improvement activities;
- Survey service recipients;
- Dispose of identifiable information;
- Respond to or initiate legal proceedings;
- Conduct research (subject to certain rules);
- Compile statistics;
- Report to the government as required by law;
- Allow for the analysis, administration and management of Milestone Foster Homes;
- Comply with legal and regulatory requirements; and
- Fulfill other purposes permitted or required by law.

At Milestone, we collect information about children who are in need or may be in need of our services. This includes the personal information about the child and about the important people in the child's life. We collect this information from the referring agency, the child, their family or indirectly from members of the community or from other service providers.

We also collect personal information about staff and caregivers. We collect most of this information directly from the individual.

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

### **CHILDREN'S AID SOCIETY (CAS)**

Every CAS in Ontario is required to have a public Notification of Information Practices. Most agencies make this available on their website. If you would like a copy for a specific agency, please speak with a Milestone representative who will be able to obtain a copy for you.

The information collected by CAS from Milestone may be shared with other CASs: This is permissible by Ontario law.

### **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 caregivers or clients. We only give personal information about individuals 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 OPTIONS**

We do not need your permission to fulfill our primary role as a foster care provider. The *CYFSA, 2017* Part X indicates that Milestone may use information without your consent for planning,

managing and delivering foster care services. Additionally, we do not need permission to collect, use and disclose your personal information in order to keep you, or others, safe (i.e., when we are obligated to assess, eliminate and reduce a risk of serious harm).

Sometimes you will have the right to make choices about the collection, use and sharing of your personal information. Whenever it is required, we will ask you for permission to share your information prior to doing so: 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 limits.

When there is the right to consent, you may make your own decisions if you are capable of making decisions. We will always assume that you are capable of making your own decisions unless there is a reason to believe that you are not (e.g., an infant). 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 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 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 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 treatment or counselling records if you were the only person who consented to the treatment/counselling.

- If you are capable, your information decisions will override your parent's or guardian's decisions about your personal information.

## **HOW WE KEEP INFORMATION AND HOW WE DISPOSE OF FILES**

At Milestone we use a combination of paper and electronic records. All records are stored for 20+ years. When we dispose of any personal information, it is done so securely.

CPIN (the Child Protection Information Network) is integrated software where all child protection information in the Province of Ontario is stored. CPIN is used by all CASs but not by private foster care agencies such as Milestone.

CPIN contains information about children and their families who receive service from CAS. CPIN also contains a file for all of Milestone's foster parents.

## **SAFEGUARDS**

Your personal information must be kept private and secure. Everyone at Milestone is bound by confidentiality. Milestone must protect your information from loss or theft and make sure that no one looks at it or does something with your information unless permitted as part of their job. When there is a privacy breach, we will tell you (we are required to tell you by law).

Safeguards apply equally to Milestone's electronic records and paper records as well as to copies of records, reports, financial records, administrative notes, voice messages, text messages, and emails (including on laptops and cellphones) and any other ways that personal information can be recorded.

### **ACCESS AND CHANGES TO YOUR PERSONAL INFORMATION**

With limited exceptions, you have the right to access the personal information that Milestone holds about you.

If you need a copy of your records, please contact us, in writing at 3365 Harvester Road, Suite 201, Burlington, Ontario, L7N 3N2 Attention: Records Disclosure or, by email at [info@milestonefosterhomes.ca](mailto:info@milestonefosterhomes.ca)

In certain situations, you may be denied access to some or all of your personal information about service (in accordance with the law). When we deny access to all or part of a record, we will give you a reason and will explain your rights to make a complaint.

We try to keep your personal information accurate and up-to-date. Please let us know if you disagree with what is recorded, and we will make the correction or otherwise we will ask you to write a statement of disagreement and we will attach that statement to your record.

## **FOR MORE INFORMATION OR COMPLAINTS**

We encourage you to contact any representative of Milestone with any questions or concerns you might have about our information practices. If your privacy questions have not been answered or issues are not resolved to your satisfaction, you may wish to make a formal privacy complaint to us by contacting:

Ashley McCurley, Manager of Foster Care  
Milestone Foster Homes  
3365 Harvester Road, Suite 201  
Burlington, ON L7N 3N2  
Phone: 905-639-5827 ext. 238  
Email: [ashley@milestonefosterhomes.ca](mailto:ashley@milestonefosterhomes.ca)

If at any time, you feel that your concerns have not been addressed to your satisfaction, you have the right to complain to the information and Privacy Commissioner (IPC) of Ontario. The IPC is responsible for making sure that privacy laws are followed in Ontario.

The Commissioner can be reached at:

### **Information and Privacy Commissioner of Ontario**

2 Bloor Street East, Suite 1400  
Toronto, ON M4W 1A8  
Phone: 416-326-3333 or 1-800-387-0073  
TDD/TTY: 416-325-7539  
Fax: 416-325-9195  
Email: [info@ipc.on.ca](mailto:info@ipc.on.ca)  
Website: [www.ipc.on.ca](http://www.ipc.on.ca)