



Region of Waterloo

HIFIS 4 Protocol: Privacy and Consent (For Service Providers)

Section A: Providing Consent in HIFIS 4

Topic	Question	Answer	HIFIS 4 Instructions
Consent in HIFIS 4	In general, how is consent collected and recorded?	<p>Clients are asked to sign the Housing Stability System (HSS) "Common Consent to Release Information Form".</p> <p>Clients only need to provide consent once when they first access the Housing Stability System.</p>	<p>The Consent module is used to record any consent given or denied by the client to share their information.</p> <p>If a person has given consent, select "Explicit" under the "Consent Type" field.</p> <p>Signed consent forms must be uploaded to HIFIS 4. You can choose to keep physical paper copies of the signed consent forms on-site.</p>
Verbal Consent	What if a client only provides verbal consent? For example, if they are calling over the phone.	<p>Clients are able to provide verbal consent.</p> <p>Service Providers must ensure that the client is made aware of the information on the HSS Common Consent Form, so that they can make an informed decision about sharing their information.</p> <p>See sample Verbal Consent Script in Section F below.</p> <p>If possible, follow up to request written consent. For example, if a client initially provided verbal consent over the phone, ask them to sign the form next time they visit in person.</p>	<p>If a person provides verbal consent, select "Explicit" under the "Consent Type" field. Type the word "verbal" into the Comments field.</p> <p>Option: You can add a bulletin to the client's record as a reminder to request signed consent next time they access service.</p> <p>If a person subsequently signs the consent form, add comments in the Comments field and/or upload the attachment.</p>
Dependents	What if a client has dependents? Should we enter their information into HIFIS 4?	<p>If a client indicates that they have dependents (under 16 years of age who are also accessing the HSS system), they should be listed on the HSS Consent Form as dependents.</p> <p>If a client has children that are over the age of 16, they should complete their own consent form.</p>	<p>Enter dependents into HIFIS 4 as part of a Family.</p> <p>If a client lists dependents under age 16 on their consent form, enter that dependent's consent into HIFIS 4 by selecting "Inherited Consent" under the "Consent Type" field.</p>

Topic	Question	Answer	HIFIS 4 Instructions
Youth	How does a youth give consent?	<p>Clients age 16 years and older can use the HSS Common Consent Form for service at organizations that serve youth.</p> <p>Consent for clients under age 16 must be provided by an adult authorized to act on behalf of the child.</p>	If a youth has signed the consent form, select "Explicit" under the "Consent Type" field.

Section B: Declining and Removing Consent in HIFIS 4

Decline Consent (Scenario 1: Sharing with Other Service Providers)	What if a client declines to sign the HSS Common Consent form because they don't want to share their information with other Service Providers?	<p>Clients can choose whether they want to share their information with other Service Providers in HIFIS 4 or not.</p> <p>If a client chooses not to share their information with other Service Providers in HIFIS 4, they can still access emergency services like Street Outreach and Emergency Shelter.</p> <p>However, they may not be eligible for some housing and service options. For example, they cannot be added to the PATHS List if they are not willing to share their name.</p>	<p>If a person does not want other Service Providers to access their information in HIFIS 4, the Consent Type must be set to "Declined – Anonymous".</p> <p>This allows you to create a file for the client, but the file will be invisible to other Service Providers; they will not appear in the shared Client List.</p>
Decline Consent (Scenario 2: No Information in HIFIS)	What if a client declines to sign the HSS Consent because they don't want their information in HIFIS 4 at all?	<p>Clients can choose not to share their personal information in HIFIS 4 at all.</p>	<p>If a client does not want to share their information in HIFIS 4 at all, the Consent Type would be set to "Declined – Anonymous" and the client is entered with an anonymous code rather than their actual name.</p> <p>The client record must be created in HIFIS 4 with a code ("SP-Anon#") in place of a name and without identifying attributes. The number included in the code must align with the file number associated with the client's paper file. This allows staff to keep track of which paper files and which HIFIS files go together.</p> <p>Do not enter any personal identifying data into the system, unless a person is willing to share specific data.</p> <p>The HIFIS 4 mandatory fields would be populated as follows:</p> <ul style="list-style-type: none"> • Enter approximate age. • Select "unknown" for Veteran Status, Aboriginal Status, Citizenship/Immigration Status. • Select "Canada" for Country of Birth and do not enter any additional information under Province or City of Birth.
Decline Consent	What if a client changes their	Clients are able to change their mind about consent and still receive	If the client declined consent but changes their mind and gives consent

(Scenario 3: Change to Consent)	mind about consent?	<p>services.</p> <p>For example, a client could decline consent initially and then provide consent later. This could potentially increase the level of service available to them.</p>	<p>at a later date, the client name and identifying information can be updated for this specific HIFIS record.</p> <p>Locate the client's file and go to the "Consent" module. Add an end date to the current consent record. Add a new record with the "Consent Type" field as "Explicit". The client's name now appears in the Client List and their file now becomes visible to all Service Providers (after attestation).</p> <p>The same process can be used if a person changes their mind multiple times. Each time a person's consent status changes, staff should add an end date to the current consent record and start a new record reflecting the client's new consent status (and upload the latest consent form).</p>
Removing Consent	What if a client wants to remove consent that was previously given?	<p>Clients have the option to remove consent at any time.</p> <p>However, it is important to note that the information previously provided remains in the database.</p>	<p>If a client chooses to remove consent, the Service Provider should locate their file in HIFIS 4 and add an end date to their consent in the Consent Module.</p> <p>If a client withdraws consent, staff can no longer make updates to the client's file. However, the information the client has already shared in HIFIS 4 continues to be viewable by staff providing that client with services in the Housing Stability System.</p> <p>If a person removes consent but still wants service, you should end their current service in HIFIS (e.g., book out) and start a new "Declined – Anonymous" file in HIFIS without identifying information.</p> <p>If a client enters the system at a later date, you will be prompted to collect consent again before their original file can be modified.</p>
Partial consent	What if a client gives partial consent?	<p>If during your conversation with the client, you get the sense that they are hesitant to share some information, you can let them know that that piece of information can be kept private.</p>	<p>If a client wants to keep certain information private (e.g., income source), there are three options:</p> <ul style="list-style-type: none"> • Enter them as "Declined – Anonymous" Consent; or • Enter them as having "Explicit" consent, but enter the

			<ul style="list-style-type: none"> fields in question as “unknown” or leave them blank; Or if a client provides certain information that they do not want it to be shared in HIFIS 4, (e.g. risk-related information) you should keep a copy of that information in the client’s paper file on-site.
Unable to consent	What should we do if a person is incapable of providing informed consent?	<p>If a person is not capable of providing consent, do not request consent.</p> <p>If a person is not capable, you may consider:</p> <ul style="list-style-type: none"> • asking them for consent at a later time or • requesting consent from an individual authorized to speak on the person’s behalf. 	If a person is not capable of providing consent, the Consent Type would be set to “Declined – Anonymous” and the client is entered with an anonymous code rather than their actual name (see above for additional details).

Section C: Other Privacy and Consent FAQs

Subpoenas	What information do we have to provide if subpoenaed?	<p>The Region is in the process of clarifying this answer and developing a policy on requests for HIFIS 4 data. Professional documentation standards and training is planned for later in 2018.</p> <p>If a Service Provider is subpoenaed before an answer has been confirmed, please contact the Region for immediate support.</p>	The Region could develop a HIFIS 4 report that allows Service Providers to extract all information about a specific client for legal purposes.
Media Requests	What if someone from the media or another organization asks for information from HIFIS 4?	<p>The Region is in the process of developing a policy on requests for HIFIS 4 data. If a data request is made before the policy has been confirmed, please contact the Region for immediate support.</p> <p>In general, Service Providers may only share non-identifying information from their own Service Provider.</p> <p>Information should not be shared about other Service Providers across the system without first receiving permission from the Region.</p> <p>For example, you could share the number of people who accessed your shelter last year, but you should not share the number of people that accessed the entire shelter system unless that information has already been made public by the Region.</p>	No HIFIS 4 reports should be shared with the media or another organization until the Region has developed a policy on data requests.
Breach of Privacy	What if a person's personal information is breached (i.e., shared inappropriately)?	<p>If a person's personal privacy has been breached through HIFIS 4, the Region must be notified immediately. Notification may also be required to the affected person.</p> <p>The Region is in the process of developing a Privacy Breach Protocol with additional details. If a breach occurs before the policy has been confirmed, please contact the Region for immediate support.</p>	HIFIS 4 will offer reports that can be used to monitor for privacy breaches. These reports are currently in development. Additional details to follow.

Sharing Personal Information	When is it ok to share personal information without a client's consent?	<p>Staff are required to share personal information if:</p> <ul style="list-style-type: none"> • A child has experienced or may be at-risk of abuse or harm; • Someone is a threat to themselves or another person; • If a court order requires information be shared; and/or • If a serious incident involving a person occurs on Service Provider property. 	Note: Currently, incidents are not recorded in HIFIS 4. This module may be turned on in the future.
Sharing Personal Information	What information from HIFIS 4 is shared with non-HIFIS Users that provide other services to clients (e.g., LHIN-funded programs)?	<p>The Region requires that organizations such as Thresholds sign confidentiality agreements to view certain information from HIFIS 4, such as the PATHS List and information about escalated cases.</p> <p>Service Providers should only share information with Region-funded providers that fall within the categories listed on the HSS Consent Form and should only share the information that is needed for service planning purposes.</p>	n/a
Data Retention	How long do we keep client files active?	<p>The Region is in the process of developing a Retention Protocol.</p> <p>Service Providers should follow their own retention protocols for any paper records that are still being used.</p>	Records are not deleted in HIFIS 4. Client files can be set to active or inactive in HIFIS 4 – see Section E for definitions. The Region's Protocol will provide additional detail on when to use these settings.

Section D: Consent Definitions

Consent Type in HIFIS 4	Definition
Under “Consent” Module	
Explicit	<p>Consent to collect and share information in HIFIS 4 is granted.</p> <p>The client has signed the HSS Consent Form.</p>
Inherited	<p>Client is a minor or is incapable of giving informed consent so will inherit consent from the family head.</p> <p>A Family Head has listed this individual as a dependent on the HSS Consent Form.</p>
Declined - Anonymous	<p>Consent to share information in HIFIS 4 is denied.</p> <p>The client has declined to sign the HSS Consent Form or has indicated that they only want to share their information with one Service Provider.</p> <p>When you select “Declined – Anonymous” for a client, their information is viewable by Users within your Service Provider, but not viewable by Users in other Service Providers. Their name is not included in the Client List.</p> <p>If a client chooses not to share their information in HIFIS at all, “Declined Anonymous” can be used to create a file with an anonymous code.</p>
Under “Assessment” Module	
Consent	<p>Indicates that the client has agreed to complete the triage tool or full assessment tool (i.e., the VI-SPDAT or Full SPDAT).</p> <p>Verbal consent is sufficient.</p>

Section E: Client Settings in HIFIS 4

Client Settings	Definition
Active	The “Active” setting indicates the status of the Client record. A client’s file is set to active when they are actively receiving services and engaged with the Housing Stability System.
Inactive	Not active. If a standard HIFIS 4 user searches for an inactive client, they can be found in the client list but they are labelled as “Inactive” and their file cannot be opened. Only administrators can access inactive files.
Hidden	Indicates if the client can be seen in various HIFIS lists. A hidden client is not visible to users except administrators. This setting is only used in extenuating circumstances. If a standard HIFIS 4 user searches for this client, they will not be found in the Client List.

Section F: Sample Verbal Consent Script

If a new client accesses services by phone, they can provide verbal consent to share their information across the Housing Stability System. They do not need to sign the form. However, you need to make sure that they understand what they are consenting to by taking the following five steps:

Step	Script
1. Ask for verbal consent	<ul style="list-style-type: none">We record information in a database that is shared across Service Providers in the region.We normally ask people to sign a form, but since you are calling over the phone, you can provide consent verbally and then sign the form next time you come in (if needed).
2. Read the most important details from the form	<ul style="list-style-type: none">Review the first two pages of the form with the client.
3. Summarize the additional details	<ul style="list-style-type: none">There is an attachment with additional information. You can receive a copy if you come on-site. Or we could email you a copy.You can choose not to share your information and still receive emergency services (like a shelter stay). But you won't be able to access additional services like more support.If you change your mind at a later date and decide to remove consent, the file we already have will still be available to staff, but any new information moving forward will be anonymous.Your basic information is shared across all Service Providers (e.g., name, date of birth and gender identity), but only the staff currently providing you with service have approval to access more information in your fileThe Region and Federal government collect anonymous information from the database to make future service improvements.
4. Ask if they have any questions	<ul style="list-style-type: none">Do you have any questions?
5. Record consent in HIFIS	n/a

Contact Information: Housing@regionofwaterloo.ca