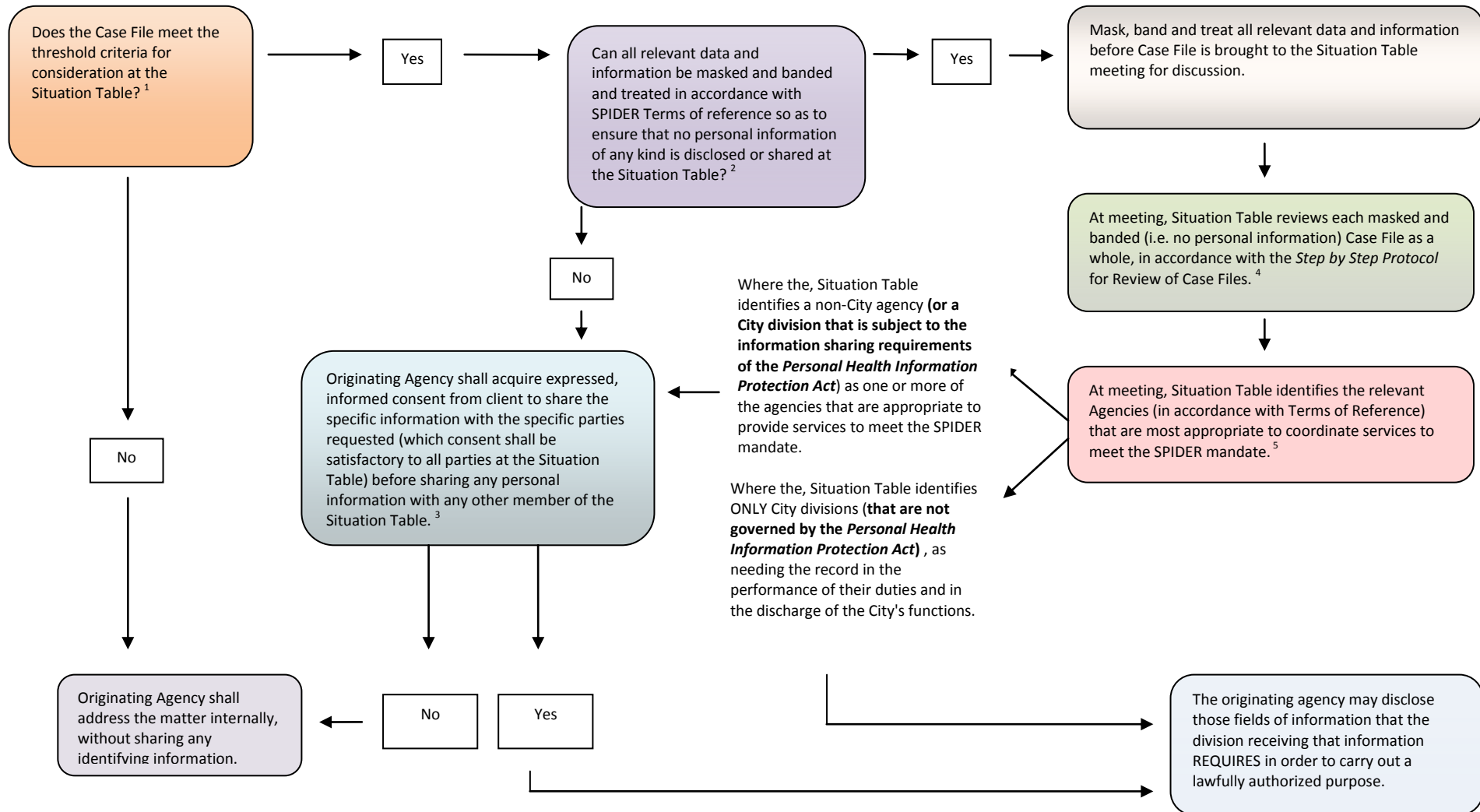# INFORMATION SHARING PROTOCOL: SPIDER PROGRAM

This Protocol is intended to serve as a mechanism for ensuring that the requirements of the *Municipal Freedom of Information and Protection of Privacy Act* ("MFIPPA") and the *Personal Health Information Protection Act, 2004* ("PHIPA") are complied with at all times. Specifically, this protocol ensures that no personal information is disclosed except where authorized by applicable legislation. Please also see "Legislative Priority" and "Application of PHIPA"

Does the Case File meet the threshold criteria for consideration at the Situation Table? [1]

Yes

Can all relevant data and information be masked and banded and treated in accordance with SPIDER Terms of reference so as to ensure that no personal information of any kind is disclosed or shared at the Situation Table? [2]

Yes

Mask, band and treat all relevant data and information before Case File is brought to the Situation Table meeting for discussion.

No

At meeting, Situation Table reviews each masked and banded (i.e. no personal information) Case File as a whole, in accordance with the *Step by Step Protocol* for Review of Case Files. [4]

Originating Agency shall acquire expressed, informed consent from client to share the specific information with the specific parties requested (which consent shall be satisfactory to all parties at the Situation Table) before sharing any personal information with any other member of the Situation Table. [3]

Where the, Situation Table identifies a non-City agency **(or a City division that is subject to the information sharing requirements of the *Personal Health Information Protection Act*)** as one or more of the agencies that are appropriate to provide services to meet the SPIDER mandate.

Where the, Situation Table identifies ONLY City divisions **(that are not governed by the *Personal Health Information Protection Act*)** , as needing the record in the performance of their duties and in the discharge of the City's functions.

At meeting, Situation Table identifies the relevant Agencies (in accordance with Terms of Reference) that are most appropriate to coordinate services to meet the SPIDER mandate. [5]

No

Originating Agency shall address the matter internally, without sharing any identifying information.

No

Yes

The originating agency may disclose those fields of information that the division receiving that information REQUIRES in order to carry out a lawfully authorized purpose.

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INFORMATION SHARING PROTOCOL: <SPIDER PROGRAM>

1. Threshold Criteria for consideration at Situation Table:

A. There is an Identified Unresolved and Elevated Health or Safety Risk involving vulnerable residents, their homes or property, and their neighbours. If left unresolved, there is high probability of requiring targeted enforcement, such as eviction and/or other emergency response. Such situations may include, but are not limited to: possession of many animals, multiple property standards and fire code violations, dilapidated living conditions, accumulation of refuse, environmental and odour issues, bed bug and other pest infestations.

And / Or

B. There is an Existing Need for the Situation Table to intervene to assign a coordinated response to the situation, for example:
(b1) A Participating Division has demonstrably exhausted all normal service provisions – including efforts to coordinate with another participating division(s) - without resolution of the situation;
(b2) A Participating Division has identified an immediate need to coordinate a complex response involving multiple Participating Divisions and lacks the resources to mobilize the response without the advice and support of the Situation Table.

2. Masking, Banding and Confidentiality Requirements for all information:

1. Describe individual by reference to gender and age range only.
2. Identify location of individual by main intersection vs. street address.
3. Describe Risk Category.
4. Describe Risk Factors.

4. Step-by-step protocol for review of Case Files at Situation Table Meetings:

1. Originating Agency identifies case through masked and banded information.
2. Originating Agency to identify the scope of any consent to share personal information.
3. Originating agency responds to questions in accordance with this protocol while minimizing disclosure of any information that could be used or combined with other information to identify client.

5. Criteria for Identification of Relevant Agencies:

1. Lead Agency and Assisting Agencies require additional information in order to provide services.
2. Participants identify potential Lead Agency and Assisting Agencies with reference to Risk Category and Risk Variables.
3. If there is insufficient information for identification of Lead Agency, the Chair will determine which agency is best suited to obtain additional information.
4. Once Lead Agency and any Assisting Agencies are identified, those Agencies will discuss the case and create actions within the scope of this protocol.
5. Identifying details may only be shared with a City division or agency where necessary for that division or agency to carry out a lawfully authorized purpose to respond to the situation.
6. When reporting back, assigned Agencies will describe the specific actions taken as well as the service(s) provided to mitigate the risk(s) of the situation in question.

3. Express Informed Consent

1. Describe PURPOSES for collection, use and disclosure.
2. Identify AGENCIES to whom disclosure will be made (ideally name the agencies).
3. Identify CONSEQUENCES of giving consent.
4. Where practical, Originating Agency to get WRITTEN CONSENT.
5. Lead Agency and Assisting Agencies should obtain WRITTEN CONSENT once connected.
6. With express informed consent of client, Originating Agency may only share details where necessary to carry out a lawfully authorized purpose.

LEGISLATIVE PRIORITY

While this Protocol has been designed to ensure that no personal information is collected, used or disclosed except for in accordance with applicable law, it is understood that should any conflict arise between this protocol and any applicable law, the applicable shall, at all times, take precedence.

APPLICATION OF PHIPA

For the purposes of this protocol, the term "personal information" shall include personal health information, as defined in the *Personal Health Information Protection Act, 2004*