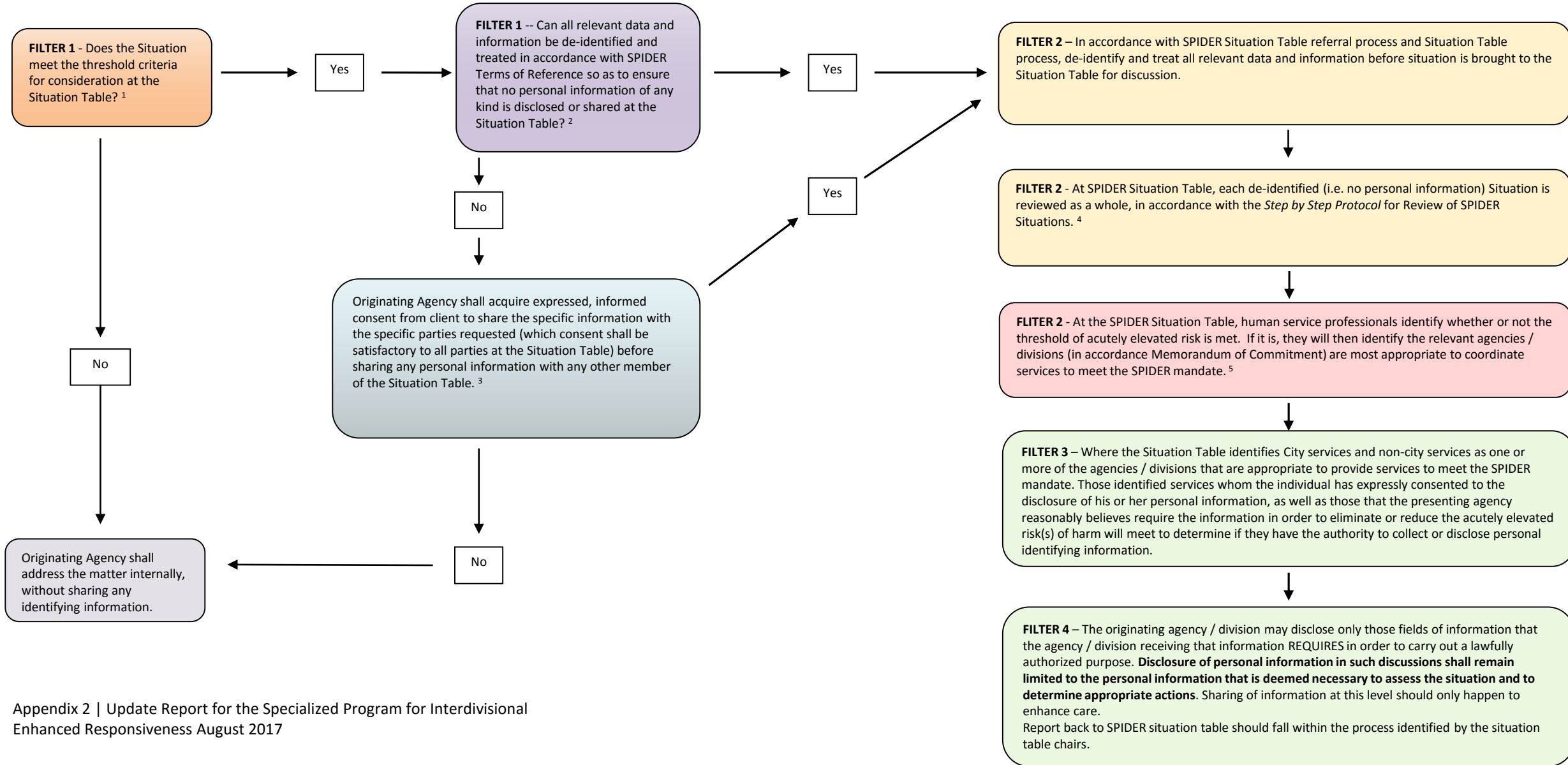


This Protocol is intended to serve as a mechanism for ensuring that the requirements of the *Municipal Freedom of Information and Protection of Privacy Act* ("MFIPPA") and the *Personal Health Information Protection Act, 2004* ("PHIPA") are complied with at all times. Specifically, this protocol ensures that no personal information is disclosed except where authorized by applicable legislation. See "Legislative Priority" and "Application of PHIPA" sections set out on page 2 of this document.



INFORMATION SHARING PROTOCOL: SPIDER PROGRAM | Updated June 22, 2017

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;

Or

(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.

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 law 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*

2. De-identified 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 Situations at Situation Table Meetings:

1. Originating Agency identifies situation 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 an individual or individuals.

Four Filter Approach to Information Sharing

Under the Four Filter Approach, the disclosing agency/organization must have the authority to disclose and each recipient agency/organization must have the authority to collect the information. The question of whether an agency/organization "needs-to-know" depends on the circumstances of each individual case.

Filter 1 – Initial Agency/Organizational Screening

Filter 2 - De-identified Discussion with Partner Agencies/Organizations

Filter 3 - Filter Three: Limited Identifiable Information Shared

Filter 4 - Filter Four: Full Discussion Among Intervening Agencies/Organizations Only

Based on: Guidance on Information Sharing in Multi-Sectoral Risk Intervention Models – Ministry of Community Safety and Correctional Services

3. Express Informed Consent

1. Describe PURPOSES for collection, use and disclosure.
2. Identify AGENCIES / DIVISIONS 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. Assisting Agencies and Divisions 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.

5. Criteria for Identification of Relevant Agencies / Divisions:

1. Assisting Agencies / Divisions require additional information in order to provide services.
2. Participants identify potential Assisting Agencies / Divisions with reference to Risk Category and Risk Variables.
3. If there is insufficient information for identification of a Lead Agency, the Chair will determine which agency is best suited to obtain additional information.
4. Assisting Agencies / Divisions are identified, those Agencies / Divisions will discuss the case and create actions within the scope of this protocol.
5. Identifying details may only be shared with an Agency / Division 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 / Divisions will describe the specific actions taken as well as the service(s) provided to mitigate the risk(s) of the situation in question.

Considerations for Report Back

This "report back" phase involves professionals receiving express consent from the individual(s) to provide an update regarding their intervention to the group, including to those who did not participate in the intervention. This may involve reporting back, in a de-identified manner, on pertinent information about the risk factors, protective factors and agency/ organization roles that transpired through the intervention. In the absence of express consent of the individual(s), the report back must be limited to the date of closure and an indication that the file can be closed or whether the intervening Agencies / Divisions need to discuss further action. If the file is being closed, limited information may be shared regarding the reason for closure (e.g., connected to service).

Relevant SPIDER Tools to Support this Protocol

1. Chair Script
2. Huddle Guidelines
3. Intervention Guidelines
4. Joint Door Knock Protocol

Guiding Principles

1. Consent
2. Professional Codes of Conduct
3. Do No Harm
4. Duty of Care
5. Due Diligence
6. Evolving Responsible Practice