

SUPPORTING THE PERSON RECEIVING SERVICES

Personal Information Management for Persons Receiving Services

Policy

1. **Definition** - Personal information is recorded information about a person receiving services and may include:
 - Name, address, phone
 - Race, national or ethnic origin, religious or political beliefs
 - Age, sex, marital status or family status
 - Legal identification or identifying numbers, including birth certificate, BC ID, SIN, PHN, etc.
 - Inheritable characteristics, blood type
 - Health care history, physical or intellectual disability
 - Educational, financial, criminal or employment history
 - Care Plans, Healthcare Plans, PSP/PATH, communication, behaviour support and emergency management plans
 - Assessments and observations about the person receiving services (log notes and progress reports)
 - The person's personal views or opinions
2. **Purposes of Collection/Use of Information** – Bethesda collects personal information about the children and adults that it serves and their families for the following purposes:
 - a) to maintain the health and/or safety of the person receiving services.
 - b) to contact and/or communicate with the person receiving services or their family.
 - c) for administering and directing the services provided and maintaining continuity in the services provided to the person receiving services.
 - d) for accountability purposes.
3. **Method of Collection** – Information will be collected in the following ways:
 - a) Directly from persons receiving services and/or their families
 - b) By compilation of records, log notes, plans, assessments, etc.
 - c) From other sources such as CLBC/MCFD Workers, Doctors, Consultants, Nurses, etc.
 - d) Electronically from the public health database by using the Personal Healthcare Number (PHN).
4. **Protection of Personal Information** – the person's personal information will only be accessed by employees who work directly with him or her, by filing personnel and/or employees who have managerial functions and require access to such information to fulfill their duties
5. **Accuracy** – Bethesda will take every reasonable measure to ensure that personal information that is maintained, used or shared is accurate.

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6. **Sharing of Information** – the information that we collect can be roughly divided into four categories: information we must share, information we will share, information we should share and information we should not share.
 - a) **Must Share** – Information that we must share includes:
 - i) Information that we are required to share by Court order, by Law or by policy that stems from relevant legislation.
 - ii) Information that we have a duty to share to protect the health, safety or well-being of persons receiving services or others.
 - b) **Will Share** – Information that we will share includes information that is non-identifying to a person or a group of individuals but which constitutes statistical information which is useful for measuring effectiveness of planning, services or which is useful for planning or research purposes.
 - c) **Should Share** – Information that we should share includes information that is necessary to support integrated services, continuity of care, effective person planning, or to increase the quality of service and support provided. This sharing may be between services within Bethesda, between Bethesda and CLBC/MCFD, another service partner or health care provider.
 - d) **Should Not Share** – Information that we should not share is:
 - i) Information that is not relevant to a person receiving services situation or not absolutely necessary for the effective provision of services.
 - ii) Information that we are prohibited from sharing by Court Order, law or by policy that stems from relevant laws.
7. **Consent to collect, use and disclose** – Bethesda will obtain consent to collect, use and disclose information for any person entering our services. The *Consent for Collection, Use, and Disclosure of Personal Information Form* will be signed prior to the commencement of services. It will define:
 - a) what information will be collected, used and disclosed.
 - b) the purpose of collecting and maintenance of such information.

Procedure

Files of support to persons receiving services will be maintained in the following manner:

1. Location of Files

Information on persons receiving services may be stored at any of the following locations:

- a) Administrative Offices
- b) Bethesda Resources

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- c) Digital mediums (e.g. ShareVision, Bethesda servers, other secure internet storage, etc.)
2. **Quality of Record** – all information in a person’s record is to be done with enough clarity and detail to permit effective implementation of the person’s support plan and the responsible provision of services concerned with their welfare. Therefore, all information is to be:
- a) legible,
 - b) dated, including month, date, and year,
 - c) signed with full name and title of person making the entry,
 - d) not abbreviated unless abbreviations are easily understood (e.g. *MCFD, CLBC, HSCL, P.R.N.*),
 - e) written in non-technical terms as much as possible.
 - f) objective, with observable behaviors, NOT interpretations or opinions unless the entry states that they are such and are defensible.
3. **Protection of Records**
- a) The agency is responsible for safekeeping of records. Records shall be kept in a filing cabinet, desk or room in a central location (*Resource and/or Administrative Office*) with controlled access and which can be locked.
 - b) The records should be safe from fire and water damage and other hazards.
 - c) A record is to be removed from the agency's jurisdiction and safekeeping only in accordance with court order, subpoena or statute.
 - d) The person’s records shall be retained for the Statute of Limitation period, 5 years. All other records (e.g. *payroll and production*) shall be retained for 10 years.
 - e) The responsibility for entering appropriate information provided by the staff members and outside services shall belong to the Resource Manager.
4. **Access to Records**
- a) The person’s records are communications of a privileged nature and therefore confidential. Access to them shall be limited to the direct support workers, management personnel, funders and other authorized persons involved in service provision.
 - b) The Resource Manager and/or contracted service provider shall be the custodian of the case records and control access to them.
 - c) The person receiving services and/or legal guardian/representative has the right to access personal information, subject to the provisions of relevant privacy acts. This request must be made in writing and provide enough information so that Bethesda can find the information with reasonable effort. In certain circumstances information may be withheld where such access contravenes the relevant privacy acts.
 - d) Informed consent of the person receiving services or their responsible party is required for the release of information to individuals not otherwise authorized to receive it. This consent must be obtained each time a request is made. This release must specify the

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- purpose for release and be time limited. Services to a person will not be withheld, restricted or contingent upon their authorizing or not authorizing release of information from their file.
- e) Information from the record is released by the agency only after the requesting person or agency clearly documents the need to know, and only when the person receiving services or their legal representative/guardian has signed an information release statement.
 - f) Requests for records maintained as a result of services by other agencies shall be referred to the agency originally providing the services. Information that is generated by Bethesda will be released with appropriate signed releases. All other information generated by other agencies or professionals must be secured from the original source.
 - g) Information may be released without consent:
 - When legally required;
 - In response to an emergency that threatens the health or safety of a person receiving services or the public; and/or
 - When otherwise required by the relevant privacy act.
5. **Entry into Records** – information is placed in a person’s file at the time intervals specified below:
- a) Prior to Admission – Bethesda management is responsible for developing the person’s file that shall include all information as identified by admissions policy for a particular service(s).
 - b) Date of Admission – the Resource Manager will review and update as necessary the items and obtain appropriate signatures as necessary, and affix appropriate documents in the file folder.
 - c) Within Six Months After Admission – the person’s Resource Manager will be responsible for documenting the following information in the person’s file:
 - i) Record of discussion with the person’s receiving services significant others describing the person’s adjustment to the service.
 - ii) Documentation of orientation as per service requirement.
 - iii) The results of initial assessment; a list of identified strengths and needs; recommendations for further assessment, recommendations for further services.
 - d) Within the 1st Year – the Resource Manager will compile a Person-Centred Plan that includes:
 - i) Profile
 - ii) Medical information
 - iii) Relevant assessments
 - iv) Care Plan and, if required, a Health Care Plan

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- v) Personal Goals
 - e) Continuous Records – at a minimum, continuous documentation must be made in the person’s file for the following. They may be entered in narrative form or on specialized forms designed for specific documentation.
 - Profile information (e.g. name, birthdate, diagnoses, likes/dislikes, etc.)
 - Support plans (e.g. Health Care Plan, personal care protocols, behavioural support plans, etc.)
 - Assessments (e.g. medical, vocational, behavioural, risk, psychiatric, etc.)
 - Charts and records (e.g. journals, health charts, personal tracking, professional visit outcomes, finances, etc.)
 - Meeting notes
 - Reports (e.g. incident reports, goal progress, etc.)
 - f) When a person leaves services, an Exit Review shall be placed in the person’s file within fourteen days.
 - g) Retention of Files – the person’s files are not destroyed and may be archived while they are in service. Files for persons who are deceased or have left service will be kept for 7 years, after which only selected items will be kept.
6. **Informed consent** – informed consent is given voluntarily by the person receiving services their self or by the person’s legal guardian/representative. When consent is obtained, the procedures requiring informed consent will be presented in language common to the person receiving services who is giving consent. Signed consent is required in the following situations:
- a) modification of rights
 - b) release of information from file
 - c) use of restrictive procedures
7. In the event a site/service would close, all records shall be sent into secure storage.

Also see Policy Sections:

- Philosophy & Services – Personal Information Management
- General Policies – Freedom of Information & Protection of Privacy Act
- General Policies – Protection of Privacy Act
- Personnel – Employee Personal Information Management