

True North of Columbia, Inc.
Osnium Database (an HMIS comparable Database)
Privacy and Security Notice

**A written copy of this Policy is available to all who request it.
It is also available on True North's web site.**

I. PURPOSE:

This notice describes the privacy policy of this agency. The policy may be amended at any time. We will not use or disclose any personally identifying information to any other entity without your written permission unless the agency is required to provide this information to meet legal obligations (subpoena). True North may, however, use or disclose *un-identifying* information (demographic) to comply with funder requirements or meet other obligations. We assume that, by requesting services from our agency, you agree to allow us to collect information and to use or disclose it as described in this notice and as otherwise required by law.

True North uses a database called Osnium to meet data collection standards required by the United States Congress and the Department of Housing and Urban Development (HUD) and to meet confidentiality standards as outlined in the Violence Against Women Act (VAWA). We collect statistical information on those who use our services and report this demographic (non-identifying) information to a central data collection system.

The information you may agree to allow us to collect may include identifying information such as your name and address and non-identifying information such as race, County of residence, age, veteran status, type of victimization, homelessness status, the number of individuals in your household, and services you received from this agency. True North, as a domestic and sexual violence victim service agency, is considered a *Blind Service Provider* in the Homeless Management Information System and, as such, does not share personally identifying client information with other agencies. We may share demographic information (non-identifying) with our community partners to illustrate service trends, report on current service levels and meet funder reporting requirements.

GENERALLY, all personal information we maintain is covered by this policy. Generally, your personal information will only be used by this agency and other agencies to which you are referred for services. Identifying information, such as your name, will be shared with other agencies only at your request and with your *written* permission.

Maintaining the privacy and safety of those using our services is very important to us. Information gathered about you is personal and private. We

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collect information only when appropriate to provide services, manage our organization, or as required by law.

II. CONFIDENTIALITY RIGHTS:

This agency has a confidential policy that has been approved by its Board of Directors. This policy follows all VAWA confidentiality regulations. Separate rules apply for HIPPA privacy and security regulations regarding medical records.

This agency will use and disclose your personal information from our database only in the following circumstances:

1. For functions related to payment or reimbursement for services (i.e., funder reports) – non-identifying information only.
2. To carry out administrative functions including, but not limited to legal, audit, personnel, planning, oversight or management functions – non-identifying information only.
3. Research – non-identifying information only.
4. Where a disclosure is required by law and disclosure complies with and is limited to the requirements of the law. Instances where this might occur are during a medical emergency, to report a crime against staff of the agency or a crime on agency premises, or to avert a serious threat to health or safety, including a person's attempt to harm himself or herself.
5. To comply with government reporting obligations – non-identifying information only.
6. In connection with a court order, warrant, subpoena or other court proceeding where disclosure is required.

III. YOUR INFORMATION RIGHTS:

As a client receiving services at this agency, you have the following rights:

1. **Access to your record.** You have the right to review your Osnum record. At your request, we will assist in viewing the record within five working days.
2. **Correction of your record.** You have the right to request to have your record corrected so that information is up-to-date and accurate to ensure fairness in its use.
3. **Refusal.** You have the right to refuse to provide any information requested although our ability to assist you may depend on our having certain personal information. If you choose not to share the information we request, basic services (shelter and most supportive services) will remain available to you but some services (such as

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financial assistance) may require specific information per funder requirements (i.e., income level, for example).

4. **Agency's Right to Refuse Inspection of an Individual Record.** True North may deny you the right to inspect or copy your personal information for the following reasons:
 - a. information is compiled in reasonable anticipation of litigation or comparable proceedings;
 - b. information about another individual other than the agency staff would be disclosed;
 - c. information was obtained under a promise of confidentiality other than a promise from this provider and disclosure would reveal the source of the information; or
 - d. information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.
5. **Harassment.** The agency reserves the right to reject repeated or harassing requests for access or correction. However, if True North denies your request for access or correction, you will be provided written documentation regarding your request and the reason for denial. A copy of that documentation will also be included in your client record.
6. **Grievance.** You have the right to be heard if you feel that your confidentiality rights have been violated, if you have been denied access to your personal records, or if you have been put at personal risk, or harmed. Our agency has established a formal grievance process for you to use in such a circumstance. To file a complaint or grievance you should contact **Jennifer Hickam, True North Director of Grants, at JenniferH@TrueNorthofColumbia.org or (573) 875-0512.**

IV. HOW YOUR INFORMATION WILL BE KEPT SECURE:

Protecting the safety and privacy of individuals receiving services and the confidentiality of their records is of paramount importance to us. Through training, policies, procedures and software, we have taken the following steps to make sure your information is kept safe and secure:

1. The computer program we use has the highest degree of security protection available.
2. Only trained and authorized individuals will enter or view your personal information.
3. Your name and other identifying information will not be contained in Osnum reports that are issued to local, state or national agencies.

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4. Employees receive training in privacy protection and agree to follow strict confidentiality standards before using the system or accessing your data.
5. The database only allows True North staff and interns access to information. Only those who should see certain information will be allowed to see that information.
6. The database is housed on a closed network protected by a firewall. No internet access to this system is available. Furthermore, identifying data stored in the database is also encrypted or coded so that it cannot be recognized.
7. The server/database exists behind a firewall-a device meant to keep hackers/crackers/viruses/etc. away from the server.
8. The main database is kept physically secure, meaning only authorized personnel will have access to the server/database.
9. System Administrators employed by the agency support the operation of the database. Administration of the database is governed by agreements that limit the use of personal information to providing administrative support and generating reports using aggregated information. These agreements further insure the confidentiality of your personal information.

V. COMPLIANCE WITH OTHER LAWS

This agency complies with all other federal, state and local laws regarding privacy rights. Consult with an attorney if you have questions regarding these rights.

VI. PRIVACY NOTICE AMENDMENTS:

The policies covered under this Privacy Notice may be amended over time and those amendments may affect information obtained by the agency before the date of the change. All amendments to the Privacy Notice must be consistent with the requirements of the Federal Standards that protect the privacy of consumers and guide database implementation and operation.

VII. Web Site

We maintain a copy of the Privacy Notice on our web site at:

www.truenorthofcolumbia.org