GUELPH-WELLINGTON TASKFORCE FOR POVERTY ELIMINATION: AVENUES FOR CREATING AN ID BANK

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INTRODUCTION

This project was prepared for the Guelph-Wellington Poverty Taskforce (PTF). The PTF raises awareness to address the root causes of poverty through collaboration with the Guelph and Wellington communities. This report explores the avenues available for creating an ID Bank for homeless and vulnerable clients. The aim of this project was to conduct informational interviews with four other ID Banks in Ontario in order to inform the PTF’s start-up and implementation processes. An ID Bank is a safe place that allows clients without stable or secure housing to store their IDs. Having a permanent and protected location for IDs is important for vulnerable and homeless clients since IDs are often needed to access housing; to open a bank account; for employment; and for various programs and services in the community.

This report has two sections. The first section provides a summary of background information on the four ID Banks interviewed. The second section consists of a table which synthesizes the responses to the questions formulated by the PTF. This report will provide the PTF with relevant and in-depth information on the monetary, operational and logistical requirements needed to initiate an ID Bank.

METHODS

This research focused on understanding the avenues available that have been developed and used by other organizations to create ID Banks. To accomplish this task, informational interviews were conducted using questions created by the PTF. The organizations that were contacted were identified by the PTF. Two interviews were conducted by each researcher over the phone over a month-long period (November 23 – December 17, 2015). This report provides a first step in understanding the variety of possibilities in setting up an ID bank, which will help inform what will be best-suited for the PTF.

RESULTS/FINDINGS

Background Information on ID Banks

Four organizations were interviewed: Home Base Housing, the Awenen Niin ID Bank (Kinna-aweya Legal Clinic), ID Safe Place and Mail (Canadian Mental Health Association), and ID Safe (Street Health). Each one is discussed in more detail below.
Home Base Housing (HBH)

HBH is a not-for-profit organization that provides support to those who are homeless or at-risk of homelessness, aged 16 and older. Some of their services include affordable housing, emergency shelters, and support services such as the ID Bank. The ID Bank is only one of the many services offered, and additional services such as the mail service program, local housing listings, internet, and phone services are accessed more frequently than the ID Bank. Nevertheless, the organization offers supports such as providing the necessary application fees for those who need IDs, and filling out ID applications alongside clients.

Additional information provided to the researchers, such as the ID Bank Brochure, may provide supplementary information to the PTF. This information is found in Appendix A.

Awenen Niin ID Bank (Kinna-aweya Legal Clinic)

The Kinna-aweya Legal Clinic provides pro bono legal assistance to low-income residents in Thunder Bay. The Clinic focuses on helping clients acquire income benefits and access to housing.

The Awenen Niin ID Bank, within the Legal Clinic, is part of a larger program which also consists of an ID Clinic. Although the ID Bank is a service which offers safe storage of IDs, many clients who experience unstable housing do not have any identification whatsoever. As such clinic volunteers support clients when applying for an ID. The ID clinic assists clients by funding the application fees for their forms, and aiding them in completing the application papers. The clinic also recently submitted an application to the Office of the Registrar General for a fee waiver program - if clients are eligible, they are only required to pay $5.00 for their birth certificate. This initiative would significantly decrease the costs associated with acquiring this. However, strict criteria must be followed; only clients who are homeless or those at imminent threat of becoming homeless are eligible.

Additional information was provided to the researcher, including an ID Clinic File Retention Policy; ID Bank Consent Form; ID Bank Staff Operational Guidelines Procedures, and Protocols; ID Bank Retainer, Ledger, and Financial Eligibility Questionnaire; ID Bank Retainer, Ledger Eligibility Questionnaire; and ID Clinic Client Operational Guidelines; may be relevant to the PTF. This information is found in Appendix B.
ID Safe Place and Mail (Canadian Mental Health Association, Peterborough location)

The ID Safe Place was a community-based support program for individuals that require a safe place to store their ID. The goal of ID Safe Place was to provide respectful, client-centered assistance for the retention and retrieval of identification to ensure that individuals have access to necessary services.

The ID Safe Place was a part of the federally funded Homelessness Partnering Strategy under Community Support Services of CMHA, which operated for eight years. It was a program that provided accessible, client-centered outreach and integrated case management support to high-need individuals who are homeless, or at-risk of homelessness. The program is no longer operational.

Additional information provided to the researcher, including an ID Bank Consent Form; ID Bank Consent to Release Identification to a Third Party; ID Bank Release of Information; ID Bank Release of Identification to a Trustee; ID Bank Permission to Mail Identification; Client ID Inventory; ID Clinic Mission Statement; and Questions and Answers from Interview with Street Health, may be relevant to the PTF. This information is found in Appendix C.

ID Safe (Street Health)

Street Health is a non-profit community based agency that works to improve the health of homeless and under-housed people in Toronto. Street Health was initiated in 2001 by nurses who recognized a need in the community for a medical facility. As the organization evolved social services were added. They offer physical and mental health programs, as well as supports that improve the clients’ ability to access other services. ID Safe, a program at Street Health, provides safe storage of important ID for homeless or under-housed clients. The ID Access program was implemented in order to assist clients in obtaining health cards and birth certificates in order to access the other services offered. As funding increased, Street Health was able to start housing IDs within ID Safe. In the interview, the respondent pointed out that some clients have been using ID Safe for 12 years.

The following table consists of the twelve interview questions developed by PTF, and answers provided by the four organizations: Home Base Housing, the Awenen Niin ID Bank (Kinna-aweya Legal Clinic), ID Safe Place and Mail (Canadian Mental Health Association), and ID Safe (Street Health).
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<thead>
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| 1. When establishing an ID Bank, what were some of the challenges you experienced? | - Funding: Since this is not a city funded program, fundraising is required. Clients have been encouraged to advocate for funding from social services, however, they usually do not receive any.  
- Lack of staff.  
- A policy is in place that ensures that overly impaired clients are prohibited from obtaining their IDs. | - Funding: The ID Clinic provides clients with the necessary funding to apply for their IDs ($35-$45).  
- Staff consists of paralegals bound by rules of professional conduct which has its own policies. Each client has a leger with a retention record and the legal clinic's insurance covers damage. | - Funding: ID Safe Place and Mail assisted clients in applying for IDs, paid their fees, and then were reimbursed by Ontario Works.  
- The ID Bank lacked an ID Clinic which would have supported clients who are completely without ID. | - Funding: The organization is constantly required to convince funding agencies that their program is relevant and impactful. |
| 2. Is additional insurance required for an ID Bank specifically?       | - Additional insurance was not required.  
- Staff consists of paralegals bound by rules of professional conduct which has its own policies. Each client has a leger with a retention record and the legal clinic's insurance covers damage. | - Additional insurance was not required.  
- Clients are immediately provided 3 photocopies of their IDs, following certification by the ID Bank. | - Additional insurance was not required.  
- Clients accessed their IDs during hours of operation.  
- The IDs were housed in a fireproof filing cabinet, separated by file folders for each client. Once a client stored an ID, a new photo-card that stated, “This card belongs to XX, and their ID is located at the ID Safe Place”. The client kept this card and used it as ID. If the client needed the physical card, they were required to physically sign out their card. | - Additional insurance was not required. |
| 3. How do clients access their ID?                                       | - Clients can access their IDs during regular business hours.  
- Clients are immediately provided photocopies of their IDs, but they are encouraged to leave original IDs at the Bank.  
- A program exists where agencies are permitted to share digital images; this clinic will be looking into implementing a similar process in the future. | - Clients can access their IDs during hours of operation.  
- Clients are immediately provided 3 photocopies of their IDs, following certification by the ID Bank. | - Clients accessed their IDs during hours of operation.  
- The IDs were housed in a fireproof filing cabinet, separated by file folders for each client. Once a client stored an ID, a new photo-card that stated, “This card belongs to XX, and their ID is located at the ID Safe Place”. The client kept this card and used it as ID. If the client needed the physical card, they were required to physically sign out their card. | - ID Safe utilizes a simple sign in-out sheet. The consent process is explained to clients who are then asked for their signature. Digital copies are not provided or shared due to difficulty in obtaining consent. |
| 4. Are photocopies provided?                                             | - Clients are encouraged to keep photocopies and leave originals in the bank.  
- A program exists where agencies are permitted to share digital images; this clinic will be looking into implementing a similar process in the future. | - Occasionally certified copies are accepted by clients, while original IDs are stored.  
- A program exists where agencies are permitted to share digital images; this clinic will be looking into implementing a similar process in the future. | - Occasionally photocopies were made for clients, while original IDs were stored in the bank. | - Occasionally photocopies were made for clients, while original IDs were stored in the bank. |
| 5. How do provincial privacy policies impact the ID bank?                | - Provincial privacy policies do not significantly impact the ID Bank; a privacy information booklet is provided to the client, and staff members discuss consent with them beforehand.  
- Only clients can retrieve IDs.  
- The Personal Health Information Act (PHIA) impacts the Bank since it is considered a part of the health-sector.  
- Standard organizational policies comply with the policy.  
- Only clients can retrieve IDs. | - Provincial policies do not have an impact on the ID Bank.  
- Client confidentiality is emphasized to clients during the consent process.  
- Only clients can retrieve IDs. | - The Personal Health Information Act (PHIA) impacts the Bank since it is considered a part of the health-sector.  
- Standard organizational policies comply with the policy.  
- Only clients can retrieve IDs. | - The Personal Health Information Act (PHIA) impacts ID Safe since it is considered a part of the health-sector.  
- Other standard privacy policies apply.  
- Only clients can retrieve IDs. |

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<td>6. Do you track pathways?</td>
<td>- Clients’ files contain a cover sheet where all information is contained (date, type of ID, and client signature).</td>
<td>- Each client has a ledger with the date, time and type of ID being signed out. - All forms were recently consolidated so that duplications are avoided and so that single sheets can track the pathways. - A more formal tracking system is required since clients misplace their IDs multiple times.</td>
<td>- The sign in-out process tracked the pathways, along with the photo ID card. This process stated where the specific IDs were located which also helped to ensure that clients did not lose their IDs.</td>
<td>- Pathways are not tracked in a regulated manner. Those clients who are able apply for, obtain and store IDs do not frequently misplace their IDs.</td>
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<td>7. Do you need consent to share information with other agencies?</td>
<td>- Consent would be required. However, this issue does not arise often, since clients are obligated to physically retrieve their IDs. Since HBH is based in Kingston, the ID Bank is centrally located in close proximity to other services. - The ID clinic does not share information because they do not have the requisite policies. They would require partnerships or memoranda of understanding in order to do so. - Clients are permitted to put the ID clinic’s address on ID application forms in case additional forms are necessary. However that is the extent of information sharing the ID Clinic is able to exercise, and only with the government agencies. Sharing information with other organizations would be too complex.</td>
<td>- In-person consent was required. - Only two staff members were permitted to physically access IDs. - A database was used for logging client information which was also audited. The files were monitored to ensure that only relevant and authorized staff members were accessing the information. - The ID Bank had a privacy committee and two privacy officers.</td>
<td>- In-person consent is required. However, this does not usually occur.</td>
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<td>8. Is there a consent form process?</td>
<td>- The form and other information were sent to the researchers. These items are attached in the appendices. - Clients sign the consent form and they are made aware that are the sole individuals who can access their IDs.</td>
<td>- The form and other information were sent to the researchers. These items are attached in the appendices. - The ID Bank’s consent processes are evolving as their program grows.</td>
<td>- The form and other information were sent to the researchers. These items are attached in the appendices.</td>
<td>- Yes. The respondent did not elaborate. He acknowledged that obtaining consent is a difficult process and that building rapport and trust is a long-term commitment. ID Safe has been in operation since approximately 2002.</td>
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<td>9. What kinds of IDs are kept?</td>
<td>- The ID Bank manages IDs that they fund for and assist clients in securing. - These generally include birth certificates, and copies of passports; however, the ID Bank manages any type of ID that the client requests.</td>
<td>- The ID Bank currently manages long and short form birth certificates, SIN cards, although other IDs are accepted. - Health cards are currently not being held, although the clinic assists clients in obtaining health cards (the cards usually go to the client directly).</td>
<td>- The ID Bank managed any type of ID (mostly library cards, birth certificates, health cards, SIN cards).</td>
<td>- ID Safe manages any type of ID (mostly library cards, birth certificates, health cards, SIN cards).</td>
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<td>10. How many people access this service, and how often?</td>
<td>- 220 clients have used the ID Clinic in order to apply for IDs.</td>
<td>- Since 2012, 700 people have used the ID Clinics. However, few people use the ID Bank as the majority of people find it more urgent to obtain IDs; volume is expected to increase as more people obtain their IDs.</td>
<td>- Approximately 10 clients have accessed the ID Bank.</td>
<td>- Approximately 550 clients have accessed the ID Clinic and Bank.</td>
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<td>- The ID Bank is a part of a larger community development process.</td>
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<td>11. Does the ID Bank provide any additional services, such as notarizing?</td>
<td>- Mail service exists for those without a permanent address (cheques are excluded); however it is stressed that only they are permitted to retrieve mail.</td>
<td>- The main service is the ID Clinic. The clinic supports clients in filling out applications; a productive partnership with Service Ontario has been established. Clients fill out applications for an ID request and the Clinic covers the cost.</td>
<td>- A mail service program existed.</td>
<td>- Yes, a mailing address service exists. Ad hoc notarizing is also available to clients, however it does not consist of a walk-in service; it is client-specific.</td>
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<td>- A Community voicemail service also exists. This services acts as a voicemail/pager system. It is useful and free; Southeastern offered this service through their phone system's standard phone line.</td>
<td>- The Clinic acts as a safety net and encourages complementary services. The Clinic is in partnership with other service providers.</td>
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<td>- Local housing listings are also displayed 3 times a week and, internet and phone service supports are also available.</td>
<td>- The Clinic has created a training program to teach other agencies how to fill out ID applications as well as how to build capacity to allow for multiple points of access.</td>
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<td>- The Clinic also provides tenant duty council services. They assist clients during eviction – legal staff support clients during tenant board meetings.</td>
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<td>12. What are the general costs of running the ID Bank? How much is the safe? How big is it?</td>
<td>- HBH pays for the ID and helps with the application process but the cost is rolled into other programs; they track the funds by putting HBH’s address on the application form, in order to ensure that any additional forms can be sent to HBH if required.</td>
<td>- The fireproof filing cabinet was donated to the Clinic by the Credit Union; the Clinic only had to pay the moving costs.</td>
<td>- This service required staff resources in order to conduct research. The initial set-up and implementation process required some additional staff time, since new policy and procedures had to be developed.</td>
<td>- The fireproof filing cabinet is approximately 5 feet tall and 3 feet wide. It contains 5 drawers, and is heavy. The cost of the safe was unknown.</td>
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<td>requisite fees. Clients provide the fees to staff who expense their company credit card to retrieve applications online.</td>
<td>- The cost of the fireproof filing cabinet is unknown. The dimensions are also unknown, but it is quite large (contains 3 drawers).</td>
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CONCLUSIONS

The organizations that were selected for an interview were forthcoming in their willingness to share practices, opportunities and barriers in implementing an ID Bank. The main result to emphasize is that all four organizations expressed the importance of offering services to assist clients in applying for and obtaining their identification; a primary concern is that vulnerable populations experience barriers to accessing necessary IDs in the first place. As ID Safe Place and Mail noted, the majority of financial and time resources were channeled toward assistance in the application process. Without this aspect, the ID Bank’s functionality would be minimal.

The analysis of the interviews demonstrated several similarities across the organizations:

- The respondents highlighted the importance of ID Banks, although it was emphasized that the ID Banks are a subset of the broader services available.
- All four of the organizations use a fireproof filing cabinet rather than a safe.
- Each organization has a similar sign-in sign-out process that clients complete in order to track ID pathways.
- The organizations further expressed that the costs of purchasing the filing cabinet were minimal; the resources generally go toward the operations of the ID Clinics.

The analysis of the interviews demonstrated two key differences across the organizations:

- The number of clients who utilize the ID Bank service varied considerably.
- The privacy policies affecting the larger organizations (i.e. legal clinic versus health organization) create variation in the privacy impacts.

This report concludes that ID Banks are significant supports for homeless and under-housed members of the community. However, both the strengths and risks should we weighed in order to assess the viability of an ID Bank in Guelph-Wellington.
REFERENCES


APPENDIX A – HOME BASE HOUSING

Your Rights

To be treated with dignity, courtesy, respect, and free from discrimination.

To know that your identification documents will be stored in a safe location and that your personal information will be treated confidentially.

To be informed of the laws, policies, and procedures affecting the storage and transfer of your personal information.

To have full access to your identification and other personal information during regular office hours.

Your Responsibilities

To respect the gender, sexual orientation, and ethnic, cultural, and religious values of ID Bank staff and other Housing Help Centre clients and visitors.

To not be verbally or physically abusive or threatening towards ID Bank staff or other Housing Help Centre clients and visitors.

We believe that by tailoring our programming to the needs of the individuals, they will re-establish themselves as independent participants in our community.
ID Bank Services

- The ID Bank at the Housing Help Centre offers the following assistance:
  - Applying for Identification
  - Funding for Applications
  - Photocopies of your ID
  - Personal photo to store with your ID
  - Fireproof cabinet to protect your ID in case of fire
  - On-site Commissionaire to assist with affidavits
  - An address to receive your ID by mail

Who We Are

Home Base Housing has been providing Kingston community members with assistance in securing affordable housing and related services since 1987.

As a registered not-for-profit charity, Home Base Housing has distinguished itself in the area of providing creative and innovative solutions to the subject of homelessness in the Kingston community.

For more information, please contact us:

540 Montreal Street
Kingston, ON K7K 3J2
(613) 531-3779

www.kingstonhomebase.ca
Housing Help Centre

The Housing Help Centre assists clients in preventing homelessness and diverting persons from the emergency shelter system. It also offers information on all housing-related issues.

ID Bank

A secure and safe place to store and apply for personal identification.

Weekly Housing Listings

Provides clients with listings of affordable housing in our community. The listing is updated three times a week from various sources.

Voice Mail & Mail Service

Allows individuals to have a personal phone number and mailing address that can be used for keeping in touch with friends, family, landlords, employers and related agencies.

Prevention Diversion Program

Prevention services assist those who are at imminent risk of homelessness and Diversion services assist those who are seeking emergency shelter services.
**ID Bank**

Providing a secure, private and accessible place to obtain and retain your ID

540 Montreal Street
Kingston, ON K7K 3J2
(613) 531-3779
www.kingstonhomebase.ca
APPENDIX B – AWENEN NIIN ID CLINIC

AWENEN NIIN ID Clinic
FILE RETENTION POLICY FOR STAFF

Kinna-aweya Legal Clinic
PART I- Inactive ID Clinic Files

A. Files Where We Have Not Received Personal ID Documents:

If a client has applied for personal identification document(S) through the ID Clinic and we have been unable to contact them/or they have ignored all requests for contact for one year, we will deem said file “inactive”. This limitation period of one year begins from the last date we were able to successfully communicate with the client.

Once the one year-limitation has elapsed we will close the ID Clinic file and note on the “File Closing Record” why communication has lapsed with the client in question and why were not able to procure their identification.

If we have an address for the client at the end of the one-year limitation period, we will send them a letter confirming that we are closing their ID Clinic file. If we have no contact information for the client, we proceed without notifying them.

B. Files Where We Have Received Personal ID Documents:

If a client has applied for personal identification document(s) through the ID Clinic and we have been unable to contact them/or they have ignored all requests for pick-up for one year, we will deem said file “inactive”. This limitation period of one year begins from the last date we were able to successfully communicate with the client.

Once the one-year limitation has elapsed, we will close the ID Clinic file and transfer the personal identification document(s) to a new ID Bank file. A new folder will be created in the client’s name in the ID Bank. In order to complete a transfer, we must fill out a “Transfer Sheet” (see Appendix A) and file it with the document(s) in the new ID Bank folder. This “Transfer Sheet” details the type of document(s) and dates pertinent to the file for future reference.

Most importantly, the “Transfer Sheet” will flag the date that the file was transferred. If 5 consecutive years have elapsed from this date (the date of transfer) without any contact from the client, we will deem the client’s ID Bank file inactive and take steps to close it. At this point, any personal identification document(s) in the file will be returned to the government agency from where they were procured. All other records will be held...
for at least 5 years before being shredded. These limitation periods are reflective of the ID Bank policy for file retention.

If we have an address for the client at the end of the one-year limitation period, we will send them a letter confirming that we are closing their ID Clinic file and transferring its contents to a new ID Bank file (see Appendix B). Copies of this closing letter should be copied into both the ID Clinic file and the new ID Bank file. If we have no contact information for the client, we proceed without notifying them.

**PART II- Reimbursement Request**

If a client does not pick-up their personal identification document(s) through the ID Clinic process, or specifically request to have them transferred to the ID Bank, we should not make a request for reimbursement from any organization or agency authorized in their file (i.e. Ontario Works).

However, if the client does eventually retrieve their personal identification document(s), or consent after the transfer to have their documents kept in the ID Bank going forward, we are then able to locate the closed file and request reimbursement from the organization or agency indicated.
APPENDIX A: Transfer Sheet

Transfer Sheet: ID Clinic to ID Bank

Client Name: _____________________________________________________

File Number: _____________________________________________________

Type of Document: ________________________________________________

Date Opened: _____________________________________________________

Last Contact W/ Client: _____________________________________________

Date Closed: _____________________________________________________

Limitation Date (5 years): __________________________________________

Notification sent that ID will be transferred? Y___ N____

If yes, what type of notification?

Letter? _____ Date: ______

Phone Call? _____ Date:_______

If no, why not? (Ex. No contact information available)__________________

________________________________________________________________

________________________________________________________________

CW: _________________ SUP: ________________ APPROVED: __________
APPENDIX B: Transfer Closing Letter

xxx xx, 20xx

NAME
STREET
CITY, PROVINCE
POSTAL CODE

Dear CLIENT:

RE: APPLICATION FOR (IDENTIFICATION TYPE)

As you will recall you attended our Identification clinic at our office on (DATE) and requested assistance in completing the application forms to obtain a (ID TYPE). A Clinic file was opened and the application forms for a (ID TYPE) were submitted.

The application was successful and the (ID TYPE) is at our office and available for pick-up.

As our services have now been completed in this matter, we will be closing your file. We will be moving your (ID TYPE) into our secure ID Bank, where we will keep it on file for 5 years. You are welcome and encouraged to retrieve your document(s) at any time.

If we have no contact from you within 5 years, we will be forwarding your (ID TYPE) back to (GOVERNMENT DEPARTMENT). All remaining records in the file will be retained for an additional 5 years before being shredded.

If you have any further questions or concerns with respect to this matter, please do not hesitate to contact our office.

Yours very truly,

KIINNA-AWEYA LEGAL CLINIC
Awenen Niin ID Bank Consent Form

What is the ID Bank?

The Awenen Niin ID Bank offers a secure, private, and accessible place to store your Birth Certificate and other personal identification documentation.

How is your ID kept safe?

Awenen Niin ID Bank (ANIB) will keep your ID in a safe, secure, private and accessible location.

Your ID will be kept with ANIB in a locked, fireproof cabinet.

Only ANIB staff has access to this site and your information.

When ANIB office is closed the site is protected by an alarm system.

ANIB will provide you with photo copies of your ID on request.

An ID Safe and Secure photo of you will be taken when your ID is kept on site in a secure location and used strictly for identification purposes when you choose to access and sign in / out your ID.

You will receive an ANIB photo membership card when your identification is stored.

Who will have access to my personal information?

The privacy of your personal information is protected by law.

Any ID you keep at ANIB is your property. You have the right to access or retrieve your ID at any time during regular office hours.

Your personal information will be kept private and confidential. ANIB will not give your information to anyone without your consent to do so.

Your original ID documents will not be given to anyone but you apart from a legal trustee.
**Personal Rights**

The right to be treated with dignity, courtesy, and respect free from any form of discrimination, be it race, ethnicity, religion, gender, sexual orientation, financial ability, disability or age.

To know your ID will be kept in a safe location, and that your personal information will always be treated with confidentiality.

To be informed of the laws, policies, and procedures affecting the storage and transfer of your personal information.

To have full access to your ID and other personal information during office hours.

**Personal Responsibilities**

To use your ID safe photo card responsibly and to not use it for any illegal purposes.

To do your best to protect your ID safe photo card from loss or theft.

To respect the gender, sexual orientation, and ethnic, cultural, and religious values of ANIB staff and other ANIB associates.

To not be verbally or physically abusive or threatening towards ANIB staff or other ANIB associates.

To not bring any weapons onto ANIB premises.
I, ________________________________, born _____ / ____ / ____
(mm/dd/yy), understand and accept all of the above terms and conditions. I understand that I can retrieve my documents from Awenen Niin ID Bank during regular hours of operation.

______________________________
Signed

______________________________
Date

______________________________
Witness

______________________________
Date
Awenen Niin ID Bank

Staff Operational Guidelines
Procedures and Protocols

Intake, Consent, Storage and Disposal of Personal Information
Mission Statement

ID Safe and Secure (IDSS) is a community-based support program for people who are homeless, poor and socially marginalized. IDSS offers respectful, client driven assistance for the retrieval and retention of identification to ensure that clients have access to necessary and basic services.

Protection of Personal Information

Physical Security at Site:

ID Safe and Secure (IDSS) office is locked when not staffed.

All identification is stored in a locked fire-proof filing cabinet (only IDSS staff has keys to filing cabinet).

Only IDSS staff has access to these files.

Alarm security system in place at IDSS.

Managing Client’s Identification and Records

Intake:

Only trained and designated ID Safe and Secure staff can handle client’s ID.

Clients are well informed of their rights and responsibilities.

Clients are well informed of the safety and security protocols.

Clients are well informed of the handling of their ID and who has access to their personal information.

Clients are asked to provide an emergency contact and/or next of kin if available.

Clients provide answers to four verification questions included in the consent.

Clients sign an ID tracking form to identify the types of ID left at IDSS, the date stored and the date released.

Clients will be requested to have their photo taken to identify that they are users of IDSS.
Clients are issued a photo membership card to identify that they are users of IDSS (membership cards include hours of operation, IDSS address, phone and fax, client’s photo, name and date of birth.)

Client sign a consent form for the purpose of holding and releasing their ID (see Mental Capacity below).

Client information and photo are stored in a database (see database security protocol).

Clients have a choice to sign a Release of Information form to authorize IDSS to transfer specific information to a third party.

Security Protocol:

*ID Safe and Secure* computer system is firewalled, password protected and encrypted.

Only IDSS staff has direct access to files and computer data base. Limited information from IDSS computer system is shared.

IDSS staff will access the database on a need to know basis only. “Browsing” of physical or electronic files is not permitted.

The database will be backed up on a regular basis.

Mental Capacity:

Meaningful consent requires that clients have the mental capacity to understand and appreciate the reasonable consequences of their consent.

Ensure that clients are capable of giving meaningful consent. Generally, this will require that clients understand and appreciate the reasonable consequences of giving consent.

IDSS staff ensures this threshold is met by simplifying the consent form and by thoroughly examining the limitations of storing ID at IDSS (ie. hours of business).

IDSS staff will clearly and appropriately answer any questions the client might have with regard to the consent form. For consent to be meaningful:

Clients must understand the nature of *ID Safe and Secure* activities.

Clients must understand the purpose of the program and the means by which it fulfills this purpose.
Clients must be aware of what IDSS can/cannot do on their behalf.

Clients must understand how to communicate their wishes to IDSS staff, including how to terminate their participation.

If IDSS staff suspect a client is intoxicated or for some other reason unable to give valid consent, they will ask the client to return on another day. However, once a client’s identification is stored with IDSS, they have the right to retrieve their documentation at any time during regular office hours.

Disposal of Identification Documents on Death of a Client

ID Safe and Secure will inform the next of kin or trustee (named on the client consent form) that it possesses identification belonging to the deceased member and the procedure for retrieving the document/s. They will also be informed that it is their responsibility to return the identification to the relevant government agencies.

If there is no next of kin or trustee, or if the client’s identification goes unclaimed for six months, IDSS will send the documentation back to the appropriate government agency and/or destroy any unclaimed identification as well as all other records containing the client’s personal information.

All paper documents containing personal identifiable information will be shredded.

Inactive Files

Client files will be considered “inactive” in the following circumstances:

12 months of no activity on the file AND NO identification documents in the file

OR

5 years of no activity on the file AND identification documents in the file

All inactive files will be closed.

When a file is closed, the client’s records will be removed from the ID Bank

All identification documents will be returned to the issuing government agency

All records will be held in a secure facility for at least 5 years before being shredded

A client with a closed file can request to have a new Bank file opened.
AWENEN NIIN ID BANK

RETAINER, LEDGER AND FINANCIAL ELIGIBILITY QUESTIONNAIRE

CLIENT INFORMATION

DATE: _____________________________ FILE NUMBER: _____________________________

CLIENT NAME: _____________________________

DOB: _____________________________

ADDRESS:

_________________________________________________________________

CITY: ___________________________ PROVINCE: _______ POSTAL CODE: _______

PHONE: ___________________________ No. of Adults ________ Family Size: _______

ALTERNATE CONTACT INFORMATION

The following information will assist us to try to get in touch with you, if we are unable to contact you directly.

NAME: _____________________________

ADDRESS: _____________________________

CITY: ___________________________ PROVINCE: _______ POSTAL CODE: _______

PHONE: ___________________________ RELATIONSHIP TO CLIENT: _____________________________
IDENTITY VERIFICATION QUESTIONS

The following information will assist us in establishing your identity, so that we can safely and securely administer your ID and to help ensure that we do not give your documents to someone other than you.

1. Mother’s place of birth: _____________________________

2. Father’s place of birth: _____________________________

3. Mother’s maiden name: _____________________________

4. Client’s place of birth: _____________________________

5. Other - specify*: _________________________________

*this category can be used as an alternate in cases where you do not know the above answers, but have other important personal information we may use to verify you.

PART I – RETAINER

I UNDERSTAND that the Kinna-aweya Legal Clinic is staffed by community legal workers and lawyers. I would like the Clinic to represent me in all matters relating to:

Storing my personal identification documents in the ID Bank.

I AUTHORIZE the Clinic to take all actions and conduct any proceedings considered necessary in relation to this issue, and in particular:

Storing my personal identification documents in the ID Bank, handling my documents, releasing my documents to myself only, and contacting my alternate contact only if they are unable to reach me.
The Research Shop

Documents being stored:

Type: _______   Identifying Number: _____________________   Replacement
Value: __________

Type: _______   Identifying Number: _____________________   Replacement
Value: __________

Type: _______   Identifying Number: _____________________   Replacement
Value: __________

I am AUTHORIZING Kinna-aweya Legal Clinic to store the ID listed in the above ledger.

I UNDERSTAND that I can retrieve my document(s) and return it for storage during hours of operation (see ID Bank Operational Guidelines for hours).

I UNDERSTAND that if Kinna-aweya Legal Clinic has not had any contact with me for 5 years, my personal identification document(s) will be returned to the governmental agency that produced them.

In the event that Kinna-aweya Legal Clinic cannot contact me or my alternate contact, I UNDERSTAND that my documents will be managed in accordance with the ID Bank Operational Guidelines.
The **Research** Shop

**COST**

The clinic does not charge for the cost of storing personal identification documents. However, if my personal identification document(s) are released to me and I lose the document(s), I alone will be responsible for any costs associated with replacing my identification.

**REMOVAL OF REPRESENTATION**

I understand access to the Awenen Niin ID Bank is based on the financial information that has been provided. If the information is found to be untrue, or if my financial situation changes, the Clinic may no longer be able to store my ID, in which case my ID will be returned to me. I agree to advise the Clinic if my financial situation changes.

**CONFIDENTIALITY**

I understand that all information about me given to the Clinic is confidential and will not be revealed without my permission, with the following exception:

The Clinic may release information to Legal Aid Ontario concerning my financial eligibility for services.

**ID BANK GUIDELINES**

I have read and received a copy of the *ID Bank Operational Guidelines* and have had any questions or concerns addressed. I understand my rights as a client of the ID Bank, and have had the safety, security, handling, disposal and release/return procedures explained to me.

DATED IN THE DISTRICT OF THUNDER BAY THIS ___ DAY OF ______________

__________________________________  __________________________________

WITNESS SIGNATURE OF CLIENT

CLIENT IS ON OWA OR ODSPA BENEFITS AND PART II (INCOME SECTION) IS NOT REQUIRED.
AWENEN NIIN
ID Bank

Client Operational Guidelines

Created: July 2015
Revised: November 2015
Awenen Niin ID Bank

Developed and administered by Kinna-aweya Legal Clinic

**Purpose:** To provide a safe, secure and accessible storage facility for ID for people with low income in the District of Thunder Bay.

**Protection of Personal Information:**

**Security at Site**

All Identification is stored in a locked, fire-proof filing cabinet
Only Kinna-aweya Legal Clinic staff have access to these files
Filing cabinet is located away from the public areas of the office
All entrances remain locked when office is not staffed
Alarm security system is in place at Kinna-aweya Legal Clinic

**Electronic Database Security**

The database is firewall and password protected and encrypted
Only Kinna-aweya Legal Clinic staff have direct access to the database
The database is backed up on a regular basis

**Manging Client’s Identification and Records:**

Clients are required to give consent for Kinna-aweya Legal Clinic to hold and release their ID in the *Awenen Niin ID Bank Retainer, Ledger and Financial Eligibility Questionaire.*

All client ID and documents on file will be listed in the *Awenen Niin ID Bank Retainer, Ledger and Financial Eligibility Questionaire*

Only trained and designated employees have authorization to handle client’s ID, and documents will only be handled when necessary
All personal or identifying information will remain confidential

Clients are asked to provide an alternate contact who the clinic can contact if client is unable to be reached

Clients are asked to have a picture taken for their file (to help ensure proof of identity)

Client information, including client photo, will be entered into the electronic database

If a client moves out of the area and wants to have their ID sent to them, they can fax or mail their request to Kinna-aweya Legal Clinic. The request must include what document(s) they want sent, the date of the request and the client’s date of birth and signature.

**Signing In/ Signing Out Identification:**

Clients are able to pick up and return their original document(s) or certified copies at any time during hours of operation *(see page 3 for hours)*

It is the responsibility of the client to pick up and return identification to the Kinna-aweya Legal Clinic office

ID will only be released to the person listed on the document (or the parent/ legal guardian if a minor)

All releases and returns of ID will be recorded in the client’s file

Staff will verify the client’s contact information each time a document is signed in or signed out

If the electronic database does not include a client photo, clients will be asked to answer verification questions or provide proof of identity in order for documents to be released/returned

Both client and staff will be responsible for dating, signing and initialing the *Sign in/Sign out* sheet whenever ID is released or returned

**Client Rights:**

All original documents and certified copies are property of the client

The client is able to retrieve/return their ID at any time the clinic is open

The client is able to terminate their participation with the ID Bank at any time

All personal or identifying information of the client will remain confidential and secure
Kinna-aweya Legal Clinic’s Responsibilities to Client:

Inform clients of the purpose of the ID Bank
Inform clients of the security protocols of the ID Bank
Inform clients that all documents stored in the ID bank are the client’s property and the client may remove them any time during hours of operation
Inform clients of the procedure for signing in/signing out documents
Ensure that clients are capable of giving meaningful consent (that clients understand and appreciate the reasonable consequences of giving consent)
Store all personal documents and identification in a secure, locked, fireproof filing cabinet
Protect the confidentiality of clients’ personal and/or identifying information
Appropriately address all questions and concerns of client

File Activity and Disposal of Client Records:

Active files
Client files will be considered active in the following circumstances:
If the client has any identity documents stored in the ID Bank
If the client has utilized the ID bank in the last 12 months (regardless if their identity documents are currently in storage)

All Active files will remain open.

Inactive files
Client files will be considered “inactive” in the following circumstances:
12 months of no activity on the file AND NO identification documents in the file
OR
5 years of no activity on the file AND identification documents in the file
All inactive files will be closed.

When a file is closed, the client’s records will be removed from the ID Bank

All identification documents will be returned to the issuing government agency

All records will be held in a secure facility for at least 5 years before being shredded

A client with a closed file can request to have a new Bank file opened.

**Death of a Client**

When Kinna-aweya Legal Clinic has substantial reason to believe that a client has died, staff will take the following steps:

All identification documents will be returned to the issuing government agency

All other records will be held for at least 5 years before being shredded

**Other**

If for any reason Kinna-aweya Legal Clinic is to close indefinitely, a sufficient effort to return documents to the client will be made including phoning, emailing and mailing the client and/or alternate contact before identification documents are returned to the issuing government agency and all other records shredded.

**Hours of Operation:**

Regular operating hours are Monday to Friday, 9:00 a.m. to 12 noon and 1 p.m. to 5 p.m.

We close at 4:30 p.m. in July and August.

We are closed on all holidays and December 24 to January 1 every year.

Occasionally, we close during regular hours of operation for training and/or other reasons.
APPENDIX C – ID SAFE PLACE

ID Safe Place
Operational Guidelines
Procedures and Protocols

Intake, Consent, Storage and Disposal of
Personal Identification
Mission Statement

*ID Safe Place* is a community-based support program for Canadian Mental Health Association clients that facilitate quality-of-life for our clients. ID Safe Place offers respectful, client-centered assistance for the retention and retrieval of identification to ensure that clients have access to necessary services.

Protection of Personal Identification

**Physical Security at Site:**

- *ID Safe Place* office is locked when not staffed.
- All identification is stored in a locked fire-proof filing cabinet (only CMHA staff has keys to filing cabinet).
- Only *ID Safe Place* staff has access to these files, unless ordered by law through a valid warrant to release information to the police.
- Alarm security system in place at the CMHA facility.

Managing Client’s Identification and Records

**Intake:**

- Only trained and designated *ID Safe Place* staff and CMHA staff can handle client’s ID.
- Clients are well informed of their rights and responsibilities at *ID Safe Place*.
- Clients are well informed of the handling of their ID and who has access to their personal information.
- Client’s sign a consent form for the purpose of holding and releasing their ID (see Mental Capacity below).
- Clients provide answers to four verification questions included in the consent.
Clients are asked to provide an emergency contact and next of kin if available.

Clients are asked if they have a trustee who they wish to have access to their identification. A separate form is used to identify this request.

Clients sign an ID Tracking Form to identify types of ID left at ID Safe Place, the date stored and the date released.

Clients have a choice to sign a Release of Information Form to authorized ID Safe Place to transfer specific information to a 3rd party.

Clients are issued a photo membership card to identify that they are users of ID Safe (membership cards include hours of operation, ID Safe Place address, phone and fax, client’s photo, name and date of birth).

Client’s information and photo is stored in a database (see database security protocol).

Clients are made aware of CMHA complaint procedures.

Database Security Protocol:

- The database is firewall and password protected and encrypted.

- Only ID Safe Place staff and other authorized CMHA staff have direct access to the database.

- ID Safe Place will access the database on a need-to-know basis only. “Browsing” of physical or electronic files is not permitted.

- The database will be backed-up on a regular basis.

Mental Capacity:

Meaningful consent requires that clients have the mental capacity to understand and appreciate the reasonable consequences of their consent.

Ensure that clients are capable of giving meaningful consent. Generally, this will require that clients understand and appreciate the reasonable consequences of giving consent.

ID Safe Place staff ensures this threshold is met by simplifying the consent form and by thoroughly examining the limitations of storing ID at ID Safe Place (ie. hours of business).
**ID Safe Place** staff will clearly and appropriately answer any questions the client might have with regard to the consent form. For consent to be meaningful:

- Clients must understand the nature of **ID Safe Place** activities.
- Clients must understand the purpose of the **ID Safe Place** program and the means by which it fulfills this purpose.
- Clients must be aware of what **ID Safe Place** can/cannot do on their behalf.
- Clients must understand how to communicate their wishes to **ID Safe Place**, including how to terminate their participation in **ID Safe Place**.

If **ID Safe Place** staff suspect a client is intoxicated or for some other reason unable to give valid consent, they will ask the client to return on another day. However, once a client’s identification is stored with **ID Safe Place**, they have the right to retrieve their documentation at any time during regular office hours.

**Disposal of Identification Documents on Death of a Client**

- **ID Safe Place** will inform the next of kin or trustee (named on the client consent form) that it possesses identification belonging to the deceased member and the procedure for retrieving the document/s. They will also be informed that it is their responsibility to return the identification to the relevant government agencies.
- If there is not next of kin or trustee, or if the client’s identification goes unclaimed for six months, **ID Safe Place** will return unclaimed identification to relevant government agencies.
- Once the deceased client’s identification has been either returned or destroyed, **ID Safe Place** will destroy all other records containing the client’s personal information.
- **ID Safe Place** will record which documents are destroyed in their personal file, including date of destruction, type of records destroyed and client’s membership number.
- All paper documents containing personal identifiable information is shredded by **ID Safe Place**.
ID Safe Place

Intake and Consent Process

The following pages include information and forms for ID Safe Place members prior to storing their identification.

Pages 2-3.................Information to be read and understood by ID Safe Place members

Page 4....................Consent Form

Page 5....................Emergency Contacts and Next of Kin Form

Page 6....................Consent to release identification to 3rd Party

Page 7....................Release of Information to Outside Persons/Aencies

Page 8....................Release of Information to Trustee
Page 9.................Permission to Mail Identification

Page 10.................**ID Safe Place** Member Contract (1 year)
ID Safe Place

Consent Process

- **ID Safe Place** offers a secure, private, and accessible place to store your ID.

- Please read through the next two pages before signing the consent form.

**How is your ID stored?**

**ID Safe Place** will store your identification in a safe, secure, private, and accessible place.

1) Your identification will be stored at CMHA in a locked, fireproof cabinet.

2) Only **ID Safe Place** staff and ID CMHA staff have access to this site and your information.

3) **ID Safe Place** is protected by an alarm system 24 hours a day, 365 days a year.

4) **ID Safe Place** will provide you with photocopies of your identification on request.

5) You will receive an **ID Safe Place** photo membership card when your identification is stored.

**Who will have access to your personal information?**

The privacy of your personal information is protected by law.

1) Any identification you store at **ID Safe Place** remains your property. You have the right to access or retrieve your identification at any time during office hours.

2) Your personal information will be kept private and confidential. **ID Safe Place** will not give your information to anyone, including the police, unless required by law.

3) Your original ID documents will not be given to anyone but you, apart from a legal trustee or, in case of emergency, your next of kin.

4) You choose who has access to your personal information. You can:
a) Sign a form allowing ID Safe Place to release information to specific people or organizations when it is required;

b) Give written consent when the information is needed.

ID Safe Place

Personal Rights

1) To be treated with dignity, courtesy, and respect free from any form of discrimination, including race, ethnicity, religion, gender, sexual orientation, financial ability, disability, or age.

2) To know that your identification documents will be stored in a safe location, and that your personal information will be treated with confidentiality.

3) To be informed of the laws, policies, and procedures affecting the storage and transfer of your personal information.

4) To have full access to your identification and other personal information during office regular hours.

Personal Responsibilities

1) To use your ID Safe Place photo card responsibly and to not use it for any illegal purposes.

2) To do your best to protect your ID Safe Place photo card from loss or theft.

3) To respect the gender, sexual orientation, and ethnic, cultural, and religious values of ID Safe Place staff or other CMHA associates.

4) To not be verbally or physically abusive or threatening towards ID Safe Place staff or other CMHA associates.

5) To not bring any weapons onto ID Safe Place or CMHA premises.
ID Safe Place

Consent Form

I, __________________________________________________________, born
_____/_____/_______ (mm/dd/yy), understand and accept all of the above terms and
conditions. I understand that I can retrieve my documents from ID Safe Place during hours of
operation.

Address: _______________________________________    (___) _______

Phone Number

______________________________________________ 

Signed Date

______________________________________________ 

Witness Date

Verification Questions

1. Mother’s Place of Birth:________________________________________

2. Father’s Place of Birth:________________________________________

3. Mother’s Maiden Name:________________________________________

4. Place of Birth:________________________________________________
ID Safe Place

(Emergency Contact (If available)

Full Name: ________________________________ Relationship: ________________

Address: ____________________________________________________ Apt: ______

City: ____________________________ Province: ___________ Postal Code: ______

Phone: ______________________________

Next of Kin (If available)

Full Name: ________________________________ Relationship: ________________

Address: ____________________________________________________ Apt: ______

City: ____________________________ Province: ___________ Postal Code: ______

Postal Code: ______________________ Phone: ______________________________
ID Safe Place

Consent to release identification to a 3rd party

I _______________________________ born _______/_______/_______

Give permission to __________________________________________

to remove and/or return my identification documents to ID Safe Place.

Date: ________________________________________________

Signature: ____________________________________________

Witness: _____________________________________________
RELEASE OF INFORMATION

Fax # 705-748-2577

I, ___________________________________ (full name), born _____/_____/_____
(mm/dd/yy),

authorize ID Safe Place to transfer the following personal information:

________________________________________________________________________

to the following organization or individual:

Organization: _____________________________________________________________

Name of Contact Person: _________________________________________________

Relationship/Connection/Reason: __________________________________________

Address: _______________________________________________________________

Phone Number: _______________ Fax Number: ____________________________

Signature: ___________________________ Date: __________________________

Witness: ___________________________ Date: __________________________
ID Safe Place

Release of Identification to Trustee

I authorized my legal Trustee to retrieve my ID from the **ID Safe Place** office:

**ID Safe Place** Member Name: ____________________________________________

Date of Birth: __________________________________________________________________

Trustee Name: __________________________________________________________________

Trustee Address: __________________________________________________________________

City/Province: __________________________ Postal Code: ___________

Member's Signature: __________________________ Date: ___________

Witness: __________________________________ Date: ___________
ID Safe Place

Permission to Mail Identification

I, ___________________________________________ give permission to the ID Safe Place program to mail (list identification documents you give permission to mail)

________________________________________________________________________

________________________________________________________________________

to the following address:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

Signature: _________________________________

Witness: _________________________________

Date: _________________________________

COMMUNITY ENGAGED SCHOLARSHIP INSTITUTE
ID Safe Place

Client ID Inventory

I ___________________________ have stored the following Identification with **ID Safe Place**

<table>
<thead>
<tr>
<th>Type of ID</th>
<th>Inventory Date</th>
<th>Client Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td>Health card</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Birth certificate</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Driver's license</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Passport</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Citizenship card</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Landing papers</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Mission Statement:**

To provide a community-based support program for Canadian Mental Health Association (CMHA) clients that facilitates quality-of-life for our clients. The *ID Safe Place* program offers respectful, client-centered assistance for the retention and retrieval of identification to ensure that clients have access to the necessary services.

**Program Objectives:**

- To develop and implement a program that is specific to our clients that require a safe and secure local for the storage and retrieval of their identification.
- To facilitate quality-of-life for CMHA clients.
- To facilitate CMHA client’s ability to access the necessary community supports and services.
- To create and strengthen relationships between our clients, case workers, and community agencies.
- To improve our community’s social system through advocacy, education, and by assisting our clients and other agencies to remove the barriers for clients who have lost their identification.

**Facilities and Equipment:**

Due to the nature of our program, and our commitment to the confidentiality of CMHA clients, we will store all identification in a locked fire-proof filing cabinet within the trustee office at the Peterborough Branch of the CMHA agency (only CMHA staff has keys to filing cabinet).

In order to better service our clients, we plan to have one full-time employee at the agency. In addition, we will make our program more accessible through our case managers who support and advocate for our clients. Another consideration will be providing educational seminars and meetings within the community to provide knowledge and understanding of the *ID Safe Place* program.

Our promotional materials will consist of brochures and an *ID Safe Place* card for our clients. The brochures will follow the standard appearance of other programs within the agency. The *ID Safe place* card for our clients will be our standard business card on the front with the agency address, contact information and a brief statement of purpose. The back of the card will include the clients name, date of birth, location for his/her signature, and our return address should the client misplace his/her card.
ID Safe Place Questions and Answers:

1) Can you tell me more about the database that you use for I.D. safe clients?

   Very simple, took access as the framework and built around it. Search by person’s name, id birth date. Take a photo.

2) What kind of consent forms do you use?

   I will email me the policies and procedures which are just up-dated.

3) Do you use power of attorney forms for clients to have a family member have access (in the event for whatever reason the client wants them too?)

   No. Only thing that we ask is if he/she would want to give (part of intake)

4) On your website you state that storage protocols meet the requirements of ON privacy legislation. Would you be able to provide some information or shed some light on the privacy legislation for the storage protocols or where do I find the info. Or how would I go about meeting the privacy legislation standards? Laura mentioned the website Community Services and she wasn’t sure about that and told me to ask you.

   First set-up, had a lawyer go through all are policies with privacy policy lens. We are ultra, careful about privacy and security policies. We are going to do a review soon.

5) On your website it states that protocols are set up with service providers so clients do not have to show original identification. I wondered what protocols is set-up, and what is the most efficient way I could go about doing this?

   Primarily, OW (Ontario Works). We have basically agreement with them if someone shows up at their office and don’t have it in hand. And they will accept us faxing it to them.
6) Do you think that the other two programs that you provide for clients being the ID Replacement and the Secure Mail Service are necessary adjuncts to initially running the I.D. Safe?

We do. Certainly, set up I.D. Safe in response. They didn’t have a place to store. We were finding a lot of time for replacing their identification.

7) Would I be able to ask some question regarding those programs when we come up for a visit?

Yes, not a problem.

8) I wondered if there was anything else that I haven’t asked that you might think is important for us to know.

I think for now, you have the basics. Having you hear in person, show you, walk you throw all the steps, show you barriers that we worked through.