



DISCLOSURE OF COVID-19 STATUS INFORMATION AND COVID-19 INFORMATION SHARING PROTOCOL

PRP-OP-004

Effective Date: 2020/04/03

Policy Statement

It is the policy of the Regional Municipality of Peel Police Services Board that the Chief of Police is to establish procedures and processes relating to policing services during the COVID-19 pandemic in accordance with Ontario Regulation 120/20, an Emergency Order issued under Subsection 7.0.2 (4) of the *Emergency Management and Civil Protection Act*, "Access to Covid-19 Status Information by Specified Persons" (the Regulation).

1. Policy Requirements

It is the policy of the Board with respect to the disclosure of COVID-19 Status Information that the Chief of Police shall:

- a) Have a Standing Order and/or Procedure that ensures the collection, access, use, disclosure and destruction of *COVID-19 status information* is done in a manner consistent with this Policy, the *Police Services Act*, the *Municipal Freedom of Information and the Protection of the Privacy Act* (MFIPPA), section 255 of the *Municipal Act, 2001* (regarding retention and destruction of records directly related to any law enforcement activity), and any further direction/recommendations by the Ministry of Solicitor General through its All Chiefs Memorandums on this Regulation;
- b) Ensure that policing personnel continue to confirm the COVID-19 (positive) status information of an individual they have interacted with after the interaction while the Emergency order remains in effect;
- c) Develop protocols/procedures that detail:
 - i. Individuals from the Service who are permitted to make inquiries of, and receive COVID-19 (positive) information permitted by the provincial order;
 - ii. Outline specific circumstances designated Service Members may make an inquiry with respect to COVID -19 (positive) status information
 - iii. Outlining how the Service is to gain access of the COVID-19 (positive) information permitted by the provincial order; and
 - iv. Information ultimately provided to or obtained by the Service will be stored by the Service;
- d) Ensure that the implementation of the provincial order by the Service occurs in a manner consistent with Ontario's Human Rights Code, and applicable Board Policies with respect to human rights;
- e) Ensure that storage and access to the COVID 19 (positive) status information in the Service's possession maximizes confidentiality, provides access to this information to a limited number of Members to meet operational needs and segregates any information relating to an individual's COVID-19 (positive) status, or any secondary record that is created by the Service relates to this information; and

- f) Ensure that any information obtained that relates to an individual's COVID-19 (positive) status, or secondary records created based on the information when the provincial declaration of emergency is no longer in effect is permanently destroyed or as soon thereafter as is practical.

2. Reporting

The Chief of Police shall provide a report to the Board detailing compliance with this policy and regarding the destruction of the records upon the termination of the Emergency Order.

3. COVID-19 Information Sharing Protocol

1. The Board's Executive Director, as the Board's liaison, and the Chief or Chief's representative will continue to remain in close communication.
2. The Chief of Police will provide an update to the Board each week, in addition to any verbal updates as they pertain to the current status as necessary.
3. The Chief of Police or his designate shall ensure that:
 - a) The Board is informed as soon as possible of matters that have the potential to impact business continuity, including the following:
 - i. Any substantial deficiencies in deployment levels of sworn officers and/or civilians that would impact the provision of adequate and effective policing and enforce provincial orders related to the pandemic; and
 - ii. Any deficiencies in supplies or equipment, including personal protective equipment, necessary to maintain operations, including the response to the pandemic.
 - b) The Board is informed as soon as practical regarding:
 - i. Situations that may involve the need for flexibility in the application of the collective agreements;
 - ii. Any abnormal increases in calls for service or crime across the Region or in any particular geographic area, or against any particular vulnerable group, or any serious breaches of the peace related to the pandemic;
 - iii. Member wellness, for example: the number of sworn or civilian Members that cannot report for duty due to self-isolation or infection with COVID-19; and
 - iv. Succession planning at the Command level in the event members of Command are unable to perform their duties as a result of the pandemic.

4. This policy shall automatically be repealed upon termination of the Emergency Order, Ontario Regulation 120/20

5. Authority/Legislative Reference

Ontario Regulation 120/20 - Emergency Management and Civil Protection Act
Municipal Freedom of Information and the Protection of the Privacy Act 2001 Sec 255
Police Services Act
Board Minute : 08-05-20