

The Salvation Army, Central Ohio  
966 E. Main St  
Columbus, OH 43205  
Housing Programs  
Privacy Policy

**What this notice covers:**

1. The policies and practices in this notice covers the processing of protected personal information for clients of The Salvation Army's Housing Programs. Protected Personal Information (PPI) is any information we maintain about a client that: a) allows identification of an individual directly or indirectly, b) can be manipulated by a reasonable foreseeable method to identify a specific individual or c) can be linked with other available information to identify and specific client. When this notice refers to person information it means PPI.
2. The Salvation Army's Housing Programs adopted this policy because of standards of Homeless Management Information Systems issued by the Department of Housing and Urban Development. We intend our policy and practices to be consistent with these standards (see 69 Federal Register 45888).
3. This policy informs our clients, our staff, and others how we process personal information. We follow the policy and practices described in this privacy policy.
4. The Salvation Army's Housing Programs may amend this notice and change our policy or practices. We will provide advance notice of changes to this privacy policy when needed.
5. The Salvation Army's Housing Programs give a written copy of this privacy notice to each client at the time we first collect personal information.
6. We maintain a copy of this policy on our website at <http://www.SalvationArmyColumbus.org>.

**How and why we collect personal information:**

1. The Salvation Army's Housing Programs collect personal information only when appropriate to provide services or for another specific purpose of The Salvation Army's Housing Programs or when required by law. We may collect information for the following purposes:
  - a. To provide or coordinate services to clients/case management.
  - b. To locate other programs that may be able to assist clients.
  - c. To operate our organization, including administrative functions such as legal, audits, personnel, oversight, and management functions.
  - d. To comply with government reporting obligations for homeless information systems.
  - e. To produce aggregate-level outcomes.
  - f. To track individual program-level outcomes
  - g. To conduct research for planning and/or educational purposes.
2. The Salvation Army's Housing Programs only use lawful and fair means to collect personal information.
3. The Salvation Army's Housing Programs collect personal information only with the express knowledge or consent of our clients (unless otherwise required by law).
4. The Salvation Army's Housing Programs only collect person information from you with your written consent.

5. The Salvation Army's Housing Programs may also obtain information about you from:
  - a. Individuals who are with you
  - b. Individuals and/or third party agencies with your written consent.
6. The Salvation Army collects personal information directly from you for reasons discussed in this privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our program(s), to improve services for homeless persons and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate and necessary for program operations.
7. We may also receive PPI about you from:

Franklin County

- Amethyst
- Columbus Aids Task Force
- Community Housing Network
- Faith Mission/  
Faith Housing
- Friends of the Homeless
- Gladden Community House
- Homeless  
Families Foundation
- Huckleberry House
- Lutheran Social Services
- Maryhaven
- National Church  
Residence
- Pater Noster House
- Southeast, Inc.
- Volunteers of America

Balance of State Counties

- Job and Family Services
- Community Action
- Community Mental Health
- Other Housing Providers
- Coalition on Housing and Homelessness

**How The Salvation Army's Housing Programs Use and Disclose Personal Information:**

1. The Salvation Army's Housing Programs ask for your oral or written consent for all uses and disclosures of your personal information, except when required by law.
2. The Salvation Army's Housing Programs may use or disclose personal information for the following activities:
  - a. To provide or coordinate services.
  - b. For functions related to payment or reimbursement for services.
  - c. To carry out administrative functions such as legal, audits, personnel, oversight, and management functions.
  - d. To create anonymous information or aggregate information that can be used to research and statistical purposes without identifying clients.

- e. When required by law to the extent that use or disclosure complies with and is limited to the requirements of the law.
- f. To avert a serious threat to health or safety
  - i. We believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual of the public and,
  - ii. The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.
- g. To report about an individual we reasonably believe to be a victim of abuse, neglect or domestic violence to a governmental authority.
  - i. Where the disclosure is required by law and the discloser complies with and is limited to the requirements of the law
  - ii. If the individual agrees to the disclosure, or
  - iii. To the extent that the disclosure is expressly authorized by statute or regulation and either of the following are applicable:
    - 1. we believe the disclosure is necessary to prevent serious harm to the individual or other potential victims, or
    - 2. if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PPI for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure.

When we make a permitted disclosure under subparagraph (g) about a victim of abuse, neglect or domestic violence, we will promptly inform the individual who is the victim that a disclosure has been or will be made except if:

- i. we, in the exercise of professional judgment, believe information the individual would place the individual at risk of serious harm or,
  - ii. we would be informing a personal representative (such as a family member or friend), and we reasonably believe the personal representative is responsible for the abuse, neglect or other injury, and that informing the personal representative would not be in the best interest of the individual as we determine in the exercise of our professional judgment.
- h. To a law enforcement official for a law enforcement purpose, if consistent with applicable law and standards of ethical conduct.
    - i. In response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena
    - ii. If the law enforcement official makes a written request for protected personal information that:
      - 1. Is signed by a supervisory official of the law enforcement agency seeking the PPI;
      - 2. states that the information is relevant and material to a legitimate law enforcement investigation;
      - 3. identifies the PPI sought;
      - 4. is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; *and*

5. states that de-identified information could not be used to accomplish the purpose of the disclosure.
- iii. If we believe in good faith that the PPI constitutes evidence of criminal conduct that occurs on our premises;
- iv. In response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PPI disclosure consists only of name, address, date of birth, place of birth, Social Security Number, and distinguishing physical characteristics; *or*
- i. If
  - i. The official is an authorized federal official seeking PPU for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3065, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), of for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others); and
  - ii. The information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.
3. Before we make any use of disclosure of your PPI that is not described here, we seek your consent first..

### **How to Inspect and Correct Personal Information**

1. You may inspect and have a copy of your personal information that we maintain. The Salvation Army's Housing Programs offer to explain any information that you may not understand.
2. The Salvation Army's Housing Programs consider a request from you for correction of inaccurate or incomplete personal information that we maintain about you. If we agree that the information is inaccurate or incomplete, we may delete it or choose to mark it as inaccurate or incomplete and to supplement it with addition information.
3. We may deny your request for inspection or copying of PPI if:
  - a. The information was compiled in reasonable anticipation of litigation or comparable proceedings
  - b. The information is about another individual (other than a health care provider or homeless provider)
  - c. The information was obtained under a promise of confidentiality (other than a promise from a health care provider or homeless provider) and if the disclosure would reveal the source of the information or
  - d. Disclosure of the information would be reasonable likely to endanger the life or physical safety of any individual.
4. If we deny a request for access or correction, we will explain the reason for the denial. We will also include, as part of the PPI that we maintain, documentation of the request and the reason for denial.
5. To inspect, get a copy of, or ask for correction of you information submit a written request to The Salvation Army's Program Case Manager that you are in contact with on a regular basis.

### **Data Quality**

1. The Salvation Army's Housing Programs collect only personal information that is relevant to the purposes for which we plan to use it. To the extent necessary for

- those purposes, we seek to maintain only personal information that is accurate, complete, and timely.
2. The Salvation Army's Housing Programs dispose of personal information not in current use seven years after the information was created or last changed. As an alternative to disposal, we may choose to remove identifiers from the information.
  3. The Salvation Army's Housing Programs may keep information for a longer period if required to do so by statutes, regulations, contracts, or other requirements.

**Complaints and Accountability**

1. The Salvation Army's Housing Programs accept and consider questions or complaints about our privacy and security policies and practices.
2. All members of The Salvation Army's Housing Programs staff (including employees, volunteers, affiliates, contractors, and associates) are required to comply with this privacy notice. Each staff member must receive and acknowledge receipt of a copy of this privacy notice.

**History of Changes to this Notice**

1. Version 1.0: 11/25/2006 – First Draft.
2. Version 1.1: 12/12/2006
3. Version 1.2: 10/15/2007
4. Version 1.3: 11/09/2009- Rural Draft