Toxic drug and health alerts system – Privacy Policy & Collection Notice

Last updated: April 2022

The toxic drug and health alerts system is a text messaging program within the BC Centre for Disease Control's (BCCDC) Harm Reduction Services program. The BCCDC is a part of the greater Provincial Health Services Authority (PHSA). The toxic drug and health alerts system uses the text messaging platform Memora Health to provide text messaging services.

This Privacy Policy & Collection Notice (Privacy Policy) tells you how we collect, use, and store your personal information through the Memora Health platform, in accordance with the [BC Freedom of Information and Protection of Privacy Act](#) (FIPPA). In addition, this Privacy Policy outlines information we send, some risks to be mindful of, and ways you can protect your privacy.

This Privacy Policy is part of the Terms of Use for the toxic drug and health alerts system. By signing up for the toxic drug and health alerts system (i.e. texting **JOIN** to **253787**), you are expressing consent to receive toxic drug alerts and/or health information resource text messages at the mobile telephone number associated with your opt-in.

To opt-out at any time, you can text the word **STOP** to **253787**.

What We Collect & Why

Your personal information is being collected under section 26(c) and (e) of FIPPA.

When you text **JOIN** to **253787**, you are doing so for the purpose of receiving public health alerts, resource reminders, and to send BCCDC Harm Reduction Services information about toxic drugs and/or overdoses. When you subscribe to the toxic drug and health alerts system, we collect your:
- Phone number
  - To allow us to send you text messages. This number is *not* visible to Harm Reduction Services.
- Health authority
  - Collecting the health authority region you are from allows us to send you messages relevant to where you live.

We do not collect your legal name, address, birth date, email address, or Care Card (PHN) number. The only time we ask for a name is if you identify as a "superuser," however you do not need to give us your legal name. A first name or handle is fine.

Upon subscribing to the toxic drug and health alerts system, you will be automatically added to your regional Harm Reduction Service's Memora Health dashboard. Your name will appear as "Inbound" on the dashboard and phone number displayed as "XXX-XXX-XXXX".

While you are subscribed, you can text the command word **OD** to **253787** to start sending toxic drug or overdose information to Harm Reduction Services. Text the letter "**X**" at any time if you want to skip a question. You may answer with "X" to skip through all questions. If you do not answer a question, the system will resend it after one (1) hour. If you do not answer the repeated question, then the question closes after two (2) hours. You must text **OD** to **253787** to start sending information again.

How Use We Use Information

Harm Reduction Services uses information from your toxic drug and/or overdose text messages for data surveillance. Information you provide, along with information from other resource channels, may be used to issue a public health alert. If the information you provided is used in a public health alert, your identity is kept confidential.

Your information may also be used to evaluate and improve the toxic drug and health alerts system. Wherever possible, your information will be de-identified before it is used for these purposes.

Storage of Information

Your information will remain on Memora Health until your enrollment in the toxic drug and health alerts system ends, i.e. you text **STOP** to **253787**. This will be stored in a secure database with servers in Montreal, Quebec, Canada.

If any data is used post-enrollment, it will be de-identified prior to use.

You can withdraw consent from your information being stored on Memora Health's servers by contacting legal@memorahealth.com.

What We Send

The toxic drug and health alerts system provides its subscribers with:

- **Public Health Alerts:** Text messages about toxic drugs and overdose spikes in the health region you subscribe to, at the mobile telephone number provided when opting-in.

- **Resource reminders:** Text messages about where to find resources such as naloxone (narcan) and overdose prevention sites (OPS).

Your regional Harm Reduction Services team will send all public health alerts and resource reminders.

If you text in a recognized command word, e.g. NALOXONE, Felix, Memora Health's chat bot, will reply to you with relevant resource information. Felix is a software application that uses artificial intelligence (AI) to have chat conversations via text.

If you text any word(s) that is not a command word, Felix will respond with an auto-reply reminding you that your Regional Harm Reduction Services team does not monitor messages, other than bad drug and overdose information.

As per the toxic drug and health alerts system Terms of Use:
- If you think you may have a medical emergency, call your doctor or 911 immediately.
- Always seek the advice of your physician or other qualified health provider with any questions you may have regarding a medical condition. Never delay seeking medical advice or disregard professional medical advice because of a text message you received from the toxic drug and health alerts system.

Security and Confidentiality

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information you submit to us. We use strict internal procedures and technical security features to try to prevent unauthorized access, use or disclosure of your personal information. If you have

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any questions about the security of your personal information, you can contact us via the contact information at the end of this Privacy Policy.

While text messaging is a useful tool, please be aware of the following:
- Sending personal information by text messaging is not always secure,
- Text messages can be intercepted during transmission to/from your cell phone provider and Memora Health, and
- If you delete text messages from your regional Harm Reduction Services team and Felix, backup copies could still be in cyberspace.

Please also note the following:
- You are responsible for the security of your own mobile device,
- Although security measures may be used, the toxic drug and health alerts system cannot guarantee the security of the information you share over text message.

How to Protect Your Privacy
To protect your privacy while using text messaging with the toxic drug and health alerts system:
- Only text us recognized command words
  - Text the word **MENU** to **253787** to see the list of commands
- Do not include any personal information in toxic drug or overdose information you send us, and
- Text **STOP** to **253787** at any time if you do not want to get text messages from the toxic drug and health alerts system anymore.

Privacy
PHSA, BCCDC, and its Harm Reduction Services programs are committed to maintaining confidentiality and personal privacy. To view PHSA's privacy and confidentiality policy (Ref # IA-020), please visit: http://www.phsa.ca/Documents/PrivacyandConfidentiality.pdf

Memora Health also cares about your privacy. To view Memora Health's Authorization to Use and Disclose Protected Health Information, please visit: https://www.memorahealth.com/legal/consent

Contact
BCCDC – Harm Reduction Services
655 West 12th Avenue
Vancouver, BC V5Z 4R4 Canada
harmreduction@bccdc.ca

Important: If you have an emergency, call 9-1-1 or go to the closest emergency department. Do not text Harm Reduction Services for emergencies.

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