

## Investigation report

	<b>Complaint:</b> Unauthorized acquisition of PII (personally identifiable Information)
	<b>Investigator:</b> Kevin M. Kincaid Security Manager
	<b>Date/Time investigation began:</b> August 8, 2023
	<b>Background to the investigation:</b>  Emily Rice, City Solicitor requested Human Resources assistance in an issue involving the unauthorized acquisition of personally identifiable information.  Rice reported being notified by Chief Cashin, Manchester Fire of the incident. It was reported that Alderman Crissy Kantor obtained personal information on guests at the Emergency shelter on Beech St.

<b>Process of investigation</b>	<b>Persons interviewed:</b> -Shift Supervisor Ryan Cashin-Fire Chief Jonathan King-Shelter Manager Adrienne Beloin-Director of Housing Stability
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<b>The investigation findings</b>	<b>Investigative Summary:</b>  At the time of the release of the information the 39 Beech Street emergency shelter was under the management of the Fire Department with the Homeless Director, Adrienne Beloin.  Employees manning the shelter were contracted through Maxim health.
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It was reported by Chief Cashin, Manchester Fire Department that Alderman Crissy Kantor and Amanda Robichaud entered the shelter on August 6, 2023. The contracted employee on site was

told me Kantor brought some refreshments for the guests and was asking general questions about how many people were at the shelter, how long they were there and what was the plan to transition them from the shelter.

explained at this time the shelter was acting as an emergency shelter only and would be transitioning to additional services soon. The shelter was going to transition to an engagement center in the future.

told me Kantor identified herself as a Manchester Alderman and asked to see the guest sign in sheet. Robichaud identified herself as working at Gatehouse. said she showed it to Kantor and Kantor took some photographs and requested email her the sign in sheet.

told me she did email the list to Kantor. She told me the sign in sheet had information on guests from February to April 2023. The list contained statistics on how many people were at the shelter.

told me the sheet also had date of entry, full name, date of birth, gender, contact telephone number, any reportable medical issues, needed accommodations and what type of services needed.

said the conversation was very cordial. She did feel a little uncomfortable with some of the questions. Kantor and Robichaud left a short time later.

told me after they left she thought she should notify her supervisor of the visit. She contacted Jake King, Shelter Manager.

said she was told that she could only release information to Chief Cashin and Adrienne Beloin.

I asked if any documents or folders were taken from the shelter by Kantor or anyone else. said no, only photographs.

	<p>I spoke with Chief Cashin, Manchester Fire Department. Chief Cashin said when he learned of the release of information he contacted Alderman Kantor.</p> <p>Cashin said he requested Kantor return or destroy the information as it was protected information. According to Cashin, Kantor declined.</p> <p>I spoke with Jonathan King, Maxim Health Shelter Manager. King told me the information released to Kantor had personal information on it.</p> <p>King told me their policy is to only release this type of information to government officials. King told me the intention of that policy was that only the Fire Chief and Beloin would receive this information.</p> <p>King told me he clarified the policy to staff to prevent this situation from happening again. King provided me a copy of the shelter report completed by (attached)</p> <p>I asked King if any documents or folders were taken from the shelter by Kantor or anyone else. He told me he had no information that any physical documents were taken. He was concerned about the information that was emailed.</p> <p>I spoke with Adrienne Beloin. Beloin told me at the time of this incident the shelter was operating as an emergency shelter only. It was to provide temporary shelter to people in need.</p> <p>Beloin said the the shelter policy is for limited access only. Access is limited to care providers. Family, press and visitor access is restricted to protect privacy of guests.</p> <p>Beloin told me when she was informed of what occurred she instructed King to review their current policies and to inform staff of who is allowed access to the site.</p> <p>Beloin provide me a copy of the sign in sheet that shows what information it contains. The sheet shows that 125 Males and 44 women were at the shelter during that time period.</p> <p>The list has the full name of the individual, their date of</p>
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birth, telephone number and questions regarding any medical issues or specific health concerns.

I contacted Alderman Joe Kelly Levasseur in an effort to interview Kantor. Levasseur is reportedly representing Kantor.

Levasseur told me he would speak with Kantor and asked me to provide him the questions for Kantor. I emailed him a list of those questions.

1. Did you receive any documents from staff at the shelter at 39 Beech St. that contained personal identifiable information?
2. If so, what was the purpose for obtaining this information?
3. Do you still have that information?
4. Did Chief Cashin ask you to return the documents from 39 Beech St?
5. Did you share any of the information from those documents with anyone else?
6. Were you aware that information you obtained contained personal identifiable information?

I contacted Levasseur regarding my questions and asked him if Kantor would meet with me or answer those questions. Levasseur told me his client did not wish to speak with me and he would send me an email reply.

I received an email from Levassuer. He provided me a copy of the most recent version of a complaint from a resident.

In the email he provided an answer to my "investigation":

*My client vehemently denies stealing any binder, or anything else for that matter out of 39 Beech Street. Anyone who suggests otherwise is a liar: and anyone who makes further public statements otherwise will face litigation or possible criminal action.*

Levasseur did not respond with a reply to my questions.

	<p><b>Conclusion:</b></p> <p><b>Substantiated</b></p> <p>The purpose of my investigation was to determine facts surrounding the release of personal identifiable information.</p> <p>Personal Identifiable Information (PII) is described as any representation of information that permits the identity to whom the information applies to be reasonably inferred by either direct or indirect means. PII is defined as information that directly identifies an individual by name, address, social security number or other identifying number or code, telephone number and email address or indirect identification may include a combination of gender, race, birth date, geographic indicator or other descriptors.</p> <p>An employee of the shelter on the request of Alderman Kantor emailed her a copy of the shelter bed sheet list. This list contained information on guests during a period from February to April 2023.</p> <p>This list contains the following information:</p> <ol style="list-style-type: none"> <li>1. Date of admission</li> <li>2. Time of check in</li> <li>3. First name</li> <li>4. Last name</li> <li>5. Gender</li> <li>6. Date of Birth</li> <li>7. Contact information</li> <li>8. Mobility or health issues</li> <li>9. What is needed for health issues</li> <li>10. Items for storage</li> <li>11. Do you feel safe</li> <li>12. Services you would like to be connected to</li> <li>13. Any known food allergies</li> <li>14. Are you comfortable with shelter rules?</li> </ol> <p>This information released did include PII of 125 Males and 44 women. The information was released by a Maxim Health employee to an elected official.</p> <p>The city policy on confidentiality and privacy states it is every employee's responsibility to maintain the</p>
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	<p>confidentiality of city information. Everyone must ensure that such information is not improperly disclosed. Employees must use discretion and care in maintaining confidentiality and should limit access and release of information to those who have a legitimate need to know or have authorization for its release.</p> <p>At the time of this incident a Maxim Health employee contracted with the city to operate the emergency shelter released the information to an elected official.</p> <p>Maxim policy at that time permitted the release of this information to government officials. Our city policy would have only allowed this with data redacted.</p>
	<p><b>Mitigating factors:</b></p> <p>None</p>
	<p><b>Other relevant information:</b></p> <p><b>CONFIDENTIALITY AND PRIVACY</b>  It is every employee's responsibility to maintain the confidentiality of City information. Everyone must work to ensure that such information is not improperly disclosed. Employees must use discretion and care in maintaining confidentiality and should limit access and release of information to those who have a legitimate need to know or have authorization for its release.</p>
	<p><b>Investigator's signature:</b>  Kevin M. Kincaid  Security Manager</p> <p><b>Date: December 15, 2023</b></p>
<p><b>Supporting documents</b></p>	<p>Beech Street Shelter incident report form completed by -</p>

**Beech Street Shelter  
Incident Report Form 2.0**

**Date/Time of Incident:** ~~11/2/2023~~ Sunday, August 6<sup>th</sup> 2023 11:30am

**Participant name and date of birth:** ~~Chris [redacted]~~

**Others Involved:** Chrissy Kantor (alderman) Amanda Robichard (gatehouse)

**Primary Staff/Volunteer Responding (w/contact info):**

**Incident:**

- ☐ Suicide Attempt    ☒ Medical Issue (physical, mental and/or substance abuse)    ☐ Duty to Warn  
☐ Suicide Ideation    ☐ Aggressive/Hostile Behaviors    ☐ Illegal Activity  
☐ Threat to Personal Safety (self and/or others)    ☒ Other (please describe):

**Brief Description of Incident (use back or extra pages if needed):**

~~An ambulance was called for the guest CP who was brought to the hospital for a medical condition.~~  
Chrissy Kantor (alderman) and Amanda Robichard (gatehouse Sup) came to the shelter with donuts/Starbucks for the guests. I thanked them for their donation. Chrissy then came to the staff desk asking for the sign in sheet. So I signed her into our Provider/Donor/volunteer book. She then said she was an Alderman and requesting a guest sign in sheet. I sat down and Chrissy and Amanda began asking about how we operate, how do we check identification, how we get people into detox, and if we have incentives for medication along with the shelter. Chrissy then began asking for the people sign in sheets and I did provide those for her.

**Resolution:**

- ☐ Contact Police    ☐ Contact Collaborating Agency    ☐ Participant Hospitalized  
☐ Contact Ambulance/Fire    ☐ Contact emergency contact    ☐ Develop Safety Plan  
Other (please describe):

**Description of Resolution:**

Contacted Jake to notify him of what happened. Staff are no longer to hand out documents to any official besides Chief Cashin / Adenome below. This is inside of our policies now!

**Reporting Signature:** ~~Chris [redacted]~~

**Date:** 8/19

**Supervisor Signature:** \_\_\_\_\_

**Date:** 8/19

**Office use only:**

**Is follow up needed?:** \_\_\_\_\_ **Follow up completed date:** \_\_\_\_\_

**Further comments:**

N/A