

<b>West Neighbourhood House</b>	
Policy Title:	<b>Confidentiality Policy</b>
Approved by:	West Neighbourhood House Board of Directors
Approval date:	May 2005
Revision dates:	December 2011 / September 2015 / September 2019 /

### **Policy Statement**

This policy outlines the manner in which the information of staff, participants, volunteers and donors is collected, stored and managed.

The Board, management and staff must protect and safeguard against actual and perceived threats to the safety of staff, participant, volunteer, and donor information. Good judgment and discretion should also be used when casually discussing items not explicitly designated as confidential, but which a reasonable person would see as not appropriate for casual, public conversation.

### **Applicability**

- All Staff
- Program Participants, Clients, Members
- Students
- Volunteers
- General public
- Donors
- Third Party Contractors

### **Definition**

Confidential Information - Any information about an identifiable individual staff, participant, volunteer, or donor that is collected or disclosed to West Neighbourhood House. It excludes a person's name and West Neighbourhood House contact information unless it is attached to other Confidential Information.

### **General Principles**

Confidentiality is a core principle for West Neighbourhood House. It should be remembered that some information if made public could potentially harm, marginalize or stigmatize individuals.

Confidentiality extends to all documentation and forms of communication for example, written, verbal, electronic, audio-visual, photographic, etc.

Individuals covered by this policy acknowledge a responsibility to report any instances where confidentiality appears to be misused to cover actions that might be fraudulent, unethical or criminal in their intent. West Neighbourhood House will treat such reports in confidence and will protect individuals from negative sanctions if such reporting was honestly taken without malicious intent.

Improper disclosure of Confidential Information may be cause for investigation which may lead to disciplinary action including termination, depending on the severity of the breach.

## **Procedures**

### **General Procedures**

- Only information relevant to the service(s) provided or to the employment/volunteer/donor relationship will be collected.
- All Confidential Information gathered will be kept confidential except as required by law.
- Confidential Information that is gathered informally (for example through casual conversation) will be treated in the same manner as that which is gathered formally.
- Participants will be informed that their Confidential Information may be exchanged internally, for example, between members of a program team.
- Participants consent must be attained prior to Confidential Information being disclosed to another program or agency. Such disclosure must be made in confidence and only when necessary for referral or added service arrangements.
- Requests for disclosure by police, the courts or other mandated bodies will be referred to the Executive Director or designate and will require expressed permission before their release unless the request is received in the form of a subpoena. In the event that the Executive Director approves the request only the specific Confidential Information requested will be released.
- The Confidentiality Policy shall form part of the Board and Human Resource Manual and is included in the orientation for all current and new Board members, staff, volunteers and students.
- The same rights and obligations that apply to staff and volunteers in this Policy also apply to Third Party Contractors who have access to Confidential Information at West Neighbourhood House.

### **Participant Information**

- Intake, counselling, or case consultation meetings with staff or volunteers shall be conducted in a private area, if possible.
- Files containing Confidential Information about participants will be kept in a secure room or office in locked filing cabinets when not actually in use by staff.
- Only the participants file will be open and/or visible during individual sessions.
- Confidential Information about participants will only be exchanged with other staff as part of legitimate program or service-related discussions or as a necessary aspect of supervision. It is never disclosed as part of casual, social conversation.

- A participant's consent will be obtained before any Confidential Information is disclosed to another agency when necessary for referral or added service arrangements.

### **Staff /Volunteer Information**

This Policy also applies to personnel files and formal, personnel discussions.

- Staff and volunteers are made aware of the instances where their Confidential Information will be shared with third parties (for example: social insurance numbers are used for payroll purposes).
- Supervision and disciplinary discussions will always be conducted in a private area.
- Confidential Information will never be discussed in open, informal settings.
- Files containing Confidential Information will be kept in secure cabinets in the supervisor's office. During supervision meetings only the employee's file, if required, will be open and visible.
- Files containing Confidential Information kept by the Human Resources Manager are used only for legitimate personnel management and employment purposes. These files are kept locked at all times.
- Performance review, disciplinary and other evaluative records will be discussed between a supervisor and employee before being entered in their personnel file.

### **Donor Information**

- Donors will be advised that they may be thanked publicly by first and last name. West Neighbourhood House may do so unless the donor expressly directs West Neighbourhood House to keep their name private.
- Except as provided above, donor information will be kept confidential and will only be discussed or shared on an as required basis or when the Donor has provided expressed consent for the Confidential Information to be disclosed.
- Donors Confidential Information will not be sold or traded
- Please refer to the Donations Policy for further information.

### **Reporting**

- Staff, participant, volunteer and donor information will only be reported at an aggregate level unless otherwise required by funding contracts or legislation.
- In instances where individual portraits or case examples would best convey information on program intents and successes, every effort will be made to disguise and vary personal descriptions.
- In no instance should the individual be identifiable without the individual's express consent. This includes Board meetings and its committees, West Neighbourhood House committees, advisories, and community meetings.

## Access

- Some programs may be required to obtain emergency contact/medical treatment or demographic information from their participants. Similarly, emergency contact information is obtained gathered from staff and volunteers at the point of hire or appointment. Participant information will be securely stored where other staff can readily access it for emergencies. Staff and volunteer information will be stored in their personnel files.
- Participants have the right to ask for a review of the contents of their file from the relevant program worker. Should the program worker have concerns regarding the potential impact of such information on the participant, the supervisor will be consulted.
- Staff have the right to review the contents of their personnel files in the presence of the Human Resources Manager. The process is outlined in the Collective Agreement.
- Personal information (employment / salary verification, etc.) regarding a staff member will only be released to third parties with the prior written approval of the staff member.

## **Acknowledgement of Policy**

I acknowledge that I have received and read the Confidentiality Policy and have had it explained to me.

I understand that it is my responsibility to abide by this policy and related policies of West Neighbourhood House as a condition of my employment and participation in West Neighbourhood House.

Date: \_\_\_\_\_

Name of Employee/Volunteer: \_\_\_\_\_

Signature: \_\_\_\_\_