



## POLICY ON CONFIDENTIALITY OF RECORDS

This confidentiality policy ("Policy") is designed to safeguard the privacy of clients (Little Brothers, Little Sisters, parents and guardians) and volunteers (Big Brothers and Big Sisters) while permitting the communication of information necessary to provide the most effective service in relation to the mission and purpose of Big Brothers Big Sisters of the Midlands ("Agency").

The Agency respects the confidentiality of client and volunteer records. Ensuring the confidentiality of records is an important component of responsible and professional service delivery. Subject to the limitations described below, confidential information about clients and volunteers will only be shared amongst the Agency staff, as necessary.

All records are considered to be property of the Agency. Records may not be reviewed by clients or volunteers. Clients and volunteer shall be provided, during the application process, a copy of this Policy. Clients and volunteers shall sign a statement confirming they have read and understand this Policy and agree to program participation under the guidelines it sets forth.

### Limits of Confidentiality

1. Any request for information with regard to clients or volunteers should be made to the Agency Executive Director in writing.
2. Upon such a written request, confidential information from client or volunteer records may be shared with third parties under the following conditions:
  - a) Upon presentation of a "Consent to Release Information" form appropriately signed by the client or volunteer. A copy of the executed release shall be placed in the permanent file of the client or volunteer along with a copy of the information released.
  - b) In consultation with the Agency's legal counsel and after notification of the client or volunteer (if permitted), when required by law or legal obligation to be shared, a copy of counsel's opinion and the information released shall be placed in the permanent file of the client or volunteer.
  - c) For purpose of program operation, evaluation and compliance, certain individuals or organizations such as members of the Agency's Board of Directors, Big Brothers Big Sisters of America, etc., may have access to client or volunteer records provided that such individuals or organizations treat the information as confidential and sign an agreement to that effect. A copy of the executed agreement shall be placed in an administrative file.
  - d) Client names, enrollment and participation status and outcomes results may be shared with school partners and partner organizations, where the child is enrolled, throughout the life of the match for the purpose of program operation and evaluation provided that such individuals or organizations treat the information as confidential and sign an agreement to that effect. A copy of the executed agreement shall be placed in an administrative file.

3. When necessary, clients and volunteers will be asked to sign a form authorizing their image and/or their name to be printed in Agency promotional materials. A copy of the executed form should be placed in the permanent file of the client or volunteer.
4. At the time a child is considered as a match partner, certain confidential information will be shared between the prospective match parties. Names are shared only after the involved parties agree to the match. The volunteer and client parent/guardian shall agree in writing not to share confidential information with any other person. The executed statement shall be placed in the permanent record of the client.

### Management of Confidential Records

The Executive Director is considered the custodian of confidential records. It is their responsibility to supervise the management of confidential information to ensure safekeeping, accuracy and compliance with this Policy. The following measures have been put in place to ensure compliance:

- a. Location and security of written and electronic documents and devices:
  - a. All client and volunteer computer records (such as Matchforce records) are accessible only to assigned staff that is provided appropriate passwords and permission levels. Staff is given access only to the computer and paper records of applicants, volunteer and clients assigned to them.
  - b. All client records are kept in locked cabinets or locked offices.
- b. Paper files may not be taken out of the office without the approval of the Chief Program Officer.
- c. Client and volunteer records in Matchforce are kept permanently. Paper files for volunteers and clients are kept for seven (7) years. Files of matches where safety or legal concerns have been raised are kept permanently. When files are no longer necessary to keep, they are shredded.
- d. When an Agency staff member leaves employment, they provide all records to their supervisor. Access to AIM records and any other agency computer records is terminated.
- e. Records kept in the computer database are backed up daily.

### Violations of Confidentiality by Employees

At the time of employment, all new employees shall be required to review this Policy and agree to comply with its terms. The executed agreement shall be placed in the employee's permanent file.

A known violation of this Policy by a staff member may result in disciplinary action. (See Personnel Manual)