

**HAMILTON CENTER, INC.
OPERATIONS MANUAL**

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| Section: | CONFIDENTIALITY | Policy No.: | OP.9.5.03.00.00 |
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| Policy: | AUDIO/VIDEO RECORDING & PHOTOGRAPHY | Date Originated: | 03/19 |
| | | Last R/R Date: | 01/22 |
| | | BOD Approval Date: | 05/19 |
| | | Posted: | 01/22 |

PURPOSE

To establish clear and concise guidelines pertaining to audio/video recording or photography to protect the confidentiality of clients, staff, visitors. Please refer to the Hamilton Center, Inc. (HCI) Employee Handbook, section M that explains an employee's rights under the National Labor Relations Act.

POLICY

This policy applies to clients, employees, students or contractors of Hamilton Center Inc. who wish to audio/video record or photograph a client (s) or staff of Hamilton Center Inc. for psychotherapeutic purposes, educational purposes, identification, clinical supervision, security, and marketing.

POLICY COMPONENTS

- A. Digital or analog audio or video recordings and photographs can be initiated under specific guidelines, approvals and with written consent of the client(s) involved.
 1. Recordings and photographs taken by staff for psychotherapeutic, educational, practicum/internship requirements and clinical supervision purposes must be approved by the client's clinical supervisor prior to the recording/photography being initiated. Additionally, the clinical supervisor is responsible for the on-going monitoring of recording/photography of consumers for clinical supervision purposes.
 2. In addition, digital or analog recordings, and photographs of clients may also be initiated for the purpose of community education/marketing with the approval of the Chief Development Officer or his/her designee.
 3. In all circumstances, authorized consents must be obtained from the client(s) involved. If the client is a minor or over 18 years of age with a guardian, the parent or legal guardian must also authorize the taping or photography. The authorized consent must be scanned into the client's electronic medical record and then hard copy will be destroyed.

- B. For purposes of identification, digital photographs are routinely taken of clients upon admission. These photographs are labeled and stored in the clinical record and are accessible to authorized staff members. Written consent of the client is not required. In the event a patient refuses to have their picture taken, alternative methods of identification will be utilized, which may include written name on a wrist band and/or stated date of birth.
- C. There are occasions where photographs or videos are authorized of clients and clients' wounds/injuries as required by Adult Protective Services and others. In addition there are occasions where clinical photographs are taken for consultation with other physicians on the client's treatment team and/or supervising staff.
- D. For security purposes, Hamilton Center Inc. may use security cameras in buildings and on Hamilton Center, Inc. grounds.
 - 1. Signage may be posted that informs individuals that Hamilton Center Inc. uses surveillance cameras and that they may be recorded. Security cameras and recordings will be used in a professional, ethical and legal manner. Only authorized personnel will be permitted to access cameras and their recordings. Known client specific recordings will be released under the approval of the Privacy Officer or the Chief Operating Officer following review to determine that no PHI is being released without the proper consent of the client involved. All such recordings are the property of Hamilton Center Inc.
- E. To protect the privacy of others, non-authorized use of personal recording devices or cameras such as cell phones, tablets, microphones is prohibited. Consumers are prohibited from audio/video recording or photographing any clinician, Hamilton Center Inc. staff or other clients in any location during any therapeutic session.