

**HAMILTON CENTER, INC.
OPERATIONS MANUAL**

Section: **CONSUMER & FAMILY**

Policy No.: OP.09.14.00.00

Policy: **CONFIDENTIALITY**

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PURPOSE

To protect the confidentiality of all service recipients and any Hamilton Center, Inc. (HCI) business conducted on behalf of service recipients.

POLICY

HCI will maintain strict confidentiality in regard to information concerning service recipients. Service records, faxing of service related information, audio-visual/photographic materials, letters to outside parties, court appearances, and consultations are carefully monitored and controlled by HCI policy and procedure and supervisors in order to prevent breaches of confidence.

POLICY COMPONENTS

- A. Supervisors will be responsible to stress to all staff the importance of complete confidentiality in dealing with consumers. Discretion shall be used in discussing what is known about a recipient with other HCI employees. Disclosure of information obtained through clinical supervision or consulting shall be restricted to what is professionally necessary. Other employees having a valid need to know information concerning service recipients may obtain information; however, disclosures will be restricted to information that is necessary, relevant and/or verifiable.
- B. Employees are prohibited from discussing a recipient with someone who does not work for HCI unless a proper consent to release information is signed by the recipient allowing HCI to release specific information to other individuals or agencies or as otherwise permitted under state and/or federal law. Only specifically authorized HCI employees (supervisor approved) may release information. Only information that the release specifies will be released. Records shall also be protected by not allowing them to remain in unsupervised areas, and by restricting access to authorized persons only.
- C. When a recipient is seen at HCI and known personally by any member of the HCI staff, that recipient's presence at HCI should not be discussed with anyone outside HCI including members of the employee's immediate family, unless consent has been given as indicated in the recipient's record. To protect the personal and civil rights of service recipients, all student trainees and/or volunteers involved in programs of HCI shall agree in writing to protect the confidentiality of service recipients and HCI operations by signing a confidentiality agreement.

- D. Persons who might tour individual service/program sites for any purpose must first seek the permission of the Executive Directors, Directors and/or Program managers of that specific area. The site supervisor, manager or other designated person will grant permission based on the acuity and other any other environmental or consumer concerns present at the time of the tour. The HCI staff person conducting the tour is expected to tell the site manager who and how many persons want to tour. If an agreement is obtained, then touring person(s) must sign a confidentiality agreement. (Form No.:EC13.05.00.01). The site manager or other designated staff person will announce the will announce the tour so that consumers may choose to leave the area. Contractors and suppliers will be informed of HCI confidentiality policies by the Operations Department.
- E. Audio/video taping of staff and consumers used for supervision purposes will be strictly monitored by the staff's clinical supervisor. Staff and/or community wishing to audio/video tape, photograph and/or interview consumers must sign a confidentiality agreement. Authorized consents must be obtained from all consumers involved. It shall be the Marketing and Business Development Department, or appropriate Director and/or Program Manager's responsibility to ensure that appropriate consents are signed.
- F. Individual policies and procedures (including any HIPAA privacy and security policies and procedures) will cover confidentiality and consents, research practices, records and release of information.
- G. Confidentiality expectation will be discussed in new employee and program orientations. Any updates to this policy will be posted, communicated and distributed as necessary. Hamilton Center, Inc. personnel who violate any aspect of the corporation's confidentiality policies will be subject to disciplinary actions.