



Confidentiality Policy

Purpose. To comply with best practices regarding protecting client or prospective client information, whether oral, written, or by observation.

Policy. CCC recognizes the importance of maintaining confidentiality for our current, past, and prospective neighbors. For this reason, the following procedures outline the ministry's handling of information, observations, and communications concerning the neighbors we serve.

A. Confidentiality Statement

It is the policy of CCC to hold confidential all information made by, between, or about all persons whether neighbors, staff, volunteers or board members. This includes all communications, observations and other materials developed in the course of service. All personal information is to be kept absolutely confidential by staff, interns, volunteers and board members. No information concerning neighbors, staff, volunteers or board members is to be disclosed except with the explicit written permission of the individual involved.

It is required that all persons serving with CCC sign a confidentiality agreement. This agreement is placed in the file of the individual and holds all persons accountable for maintaining the ministry's confidentiality policy.

Information will be released only in accordance with the guidelines established below. This includes subpoena information, which will not be released without the approval of the Executive Director and agency counsel.

B. Definitions

1. Confidential communications. Any information that is written or spoken between a neighbor and staff, between staff members or with board members, interns and volunteers during the course of service delivery.
2. Confidential observations. All observations made by any staff member, interns, volunteer or board member regarding a neighbor in the course of service delivery.
3. Confidential information. All information received by staff members, interns, volunteers or board members in the course of service delivery, including advice, suggestions, reports or working paper given or made during the relationship with the ministry. Information that is exchanged is considered confidential and is to be kept as such by all ministry staff, interns, volunteers and board members and disclosed only to those people who are:
 - a. Working for CCC and also on behalf of the neighbor;
 - b. Not working for CCC, but working for the neighbor - for example, an attorney, advocate, welfare worker, housing worker, or other social service agent. In order to release information to these individuals, the neighbor must first sign a release of information form.



C. Maintenance of Neighbor Records

CCC maintains database and job sheet files for both statistical and informational purposes. Files are kept secured in a locked office. Files are not available to persons other than the ministry staff and certain office trained volunteers. Neighbor tracking software used on the computer is subject to the same level of security and confidentiality. Networks linked to outside ports of entry observe high level security and password encryption. Service requests will remain in the office unless the Donations Manager authorizes otherwise. The office is to be locked when no staff is present.

Neighbors should be made aware that any statement not addressed to staff or volunteers in the ministry may not be deemed covered under communication privilege and may potentially be used against them.

D. Access to Neighbor Records

All staff, interns and office volunteers who are in direct service positions have access to neighbor records.

E. Subpoenas and Testifying in Court

Only the Executive Director will accept subpoenas for the staff or records of CCC. Subpoenas will be handled by contacting the attorney issuing the order and attempting to either handle it out of court (records), or get it quashed prior to the date of appearance.



F. Retention and Destruction of Neighbor Records

Records will be retained for five years in a secure manner at CCC. At the end of this period, materials approved by the Executive Director may be removed from the files and destroyed, and the files placed in a secured closed file area. The closed file should contain only the information necessary to assist the neighbor in the future. This includes information such as basic intake information, service requests and any other pertinent documents which would aid in future requests.

G. Releasing Information With Client Consent

CCC believes that it is important for the neighbor to make all decisions regarding disclosure of information. In order to do so, the following conditions must be met:

1. Neighbors must sign a release of information form detailing to whom information can be released.
2. Consent is good for one year. One release form may be signed for multiple agencies/individuals. However, a new agency/individual may not be added once the form is signed by the neighbor.
3. The neighbor must understand what information is being shared.
4. Neighbors have the right to revoke, in writing, consent at any time.

H. Releasing Information Without Client Consent

1. Disclosure will be made to the legal guardian of any incompetent neighbor who has the necessary documentation.



2. In cases of medical or non-medical emergency where the life or safety of the neighbor is at stake, the information may be released to staff and/or law enforcement and/or medical personnel.
3. In cases where child or elderly abuse is suspected, the staff member must release information to the DCF hotline and assigned worker. This information should be oral, not written and should not include an investigation prior to the call being made.
4. Information required to be given to DCF includes: names and addresses of neighbor or neighbor's caretaker ; location of suspected abuse; DOB, sex, and race; nature and extent of the abuse, including evidence of prior abuse to the child or adult; suspected perpetrator information; family composition; relationship of suspect to the child or elderly adult; where the person making the report can be reached; any additional action taken by the reporting agency (photos, medical services, etc.).



I. Certification

I have read and understand Christians Concerned for the Community's Confidentiality Policy and agree to abide by all statements within.

NAME: _____ x

SIGNATURE: _____ x

DATE: _____ x

