



MANUAL OF ADMINISTRATION

TOPIC: Human Resources	SUBJECT: Confidentiality (Privacy)	Code: HR023
		Date of Issue: May 1997
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PURPOSE:

To clarify responsibility of the employee, volunteer or student regarding confidentiality of agency/client related information. It is essential that clients we support and staff rights regarding confidentiality be respected at all times. Staff will sign a Confidentiality Agreement upon hire and shall review the policy annually.

Breach of Confidentiality:

Breach of any Confidentiality Requirements at any time is a serious offence and will result in discipline.

Any employee knowing of a breach of confidentiality by any employee of Avenue II must report the incident immediately.

Staff discipline is confidential and Management will not disclose discipline action taken with anyone other than the person receiving the discipline.

Serious Occurrence:

As per AD155 and the MCCSS SOR guidelines will be followed for Confidentiality (Privacy) Breaches when applicable. When a Privacy Breach or potential breach occurs of a significant nature the organization will file a SOR as per SOR Guidelines and follow the guidelines. The breach will be assessed and determine the potential exposure. The organization will take action to stop or limit the exposure of personal information and mitigate the impact on affected individuals and document same.

The individual whose privacy was breached will be notified unless notification is not appropriate or possible. Include details of the incident, steps taken to address the breach and mitigate impacts, and contact information for further details.

Avenue II will analyze the events leading to the privacy breach, evaluate the steps taken to contain the breach, and identify actions to prevent future privacy breaches. The agency will also look to implement measures to prevent future breaches, such as amending privacy policies developing new security and privacy protocols, and training staff.

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Communication with Significant Others:

Professional communication with parents and significant others must be maintained at all times. Staff must refrain from disclosing staff information or giving their own opinions to parents/significant others.

CONFIDENTIALITY REQUIREMENTS

APPLICABILITY:

An employee of Avenue II, volunteer or student on placement must adhere to Confidentiality requirements of Avenue II at all times.

SCOPE:

Confidentiality guidelines encompass Avenue II, Individuals supported by Avenue II, and Businesses (employers) who have Avenue II employees, clients and or students working on site.

CONSEQUENCES:

The breach of confidentiality is a serious offense. It may result in one or more of the following repercussions:

- Legal action against yourself and/or Avenue II.
- Employee discipline or termination.
- Loss of placement opportunity for student or volunteer.
- Loss of employment or work placement for a client.
- Mental anguish to the client and significant others (e.g., parents, friends, spouses.)
- Damage to Avenue II's ability to achieve its MISSION due to loss of credibility and integrity (resulting in loss of reputation and professional competence.)
- Serious Occurrence Report to MCCSS.

DEFINITION:

Confidential material or information is defined as the following (This applies to written, electronic or verbal documents or information):

- Any individual's file or individual document, paper, letter, or notation whether originated at Avenue II or elsewhere contained therein.
- Any information which affects the personal and private lives of the people we support.
- Any information that is obtained at a business location that is in reference to the employers business (e.g., information obtained while filing or shredding, comments overheard while on placement.)
- Any information which pertains to the personal or professional life of staff.
- Agency correspondence, notes or memos.

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REMOVAL OF AGENCY FILES:
FILES MUST NEVER BE REMOVED FROM AVENUE II OFFICES.

VERBAL TRANSMISSION OF CONFIDENTIAL INFORMATION:

Clients Supported by Avenue II:

1. Information regarding a client is considered confidential in all aspects and not discussed with other clients. This is not to discourage normal social interaction.
2. No information regarding a client Avenue II supports and their lives shall be discussed outside of the employee's, student's, volunteer's professional role at Avenue II without the individual's written consent by completing a **Release of Information** form.

Staff:

1. Information in Personnel File is considered confidential unless mandated otherwise by law, legislation or collective agreement.

Employment Location:

1. Information regarding a business is considered confidential in all aspects whether pertaining to everyday operations or staff/customer relations.

Communication with the Media:

1. Only the Executive Director in conjunction with the President of the Board of Directors can communicate with the media.

Informed consent of the release of information will be obtained by completing the **Release of Information**.

STATEMENT OF ACKNOWLEDGMENT:

I, _____, have read and understand the confidentiality requirements and agree to abide by them. I understand that failure to do so will result in disciplinary and/or legal action against me.

Signature

Date

Witness

Date

*Distribution: 1st copy to employee
2nd copy to Personnel File*