

**Policy: Confidentiality and Professionalism
and Service Recipient Files**

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Approved By:	Board of Directors, Management	Review Date: April 2024
References:	Special Works: Policy and Procedures Privacy Policy # 6 Privacy Guidelines	

Statement:

The Society of Saint Vincent de Paul, Greater Toronto Central Council (hereinafter referred to as the Society) is committed to safeguarding all information collected for the purposes of conducting business and providing service to residents and clients. In addition, this policy outlines expectations of professionalism in the workplace and appropriate Vincentian/staff interactions.

Policy:

Confidentiality:

Employees, volunteers, Vincentians and members of the Board shall not disclose information obtained through the provision of programs or services. Confidential information regarding clients, employees, volunteers or the operation of the Society shall not be discussed with anyone other than authorized individuals.

Employees, Vincentians and volunteers shall not discuss any information regarding individuals in the hearing presence of other residents, visitors or outsiders, except as required to ensure the appropriate safety and security of those involved. Relevant information shall only be shared with other parties pending proper, fully executed consent of the individual involved.

Professionalism:

Employees, volunteers, Vincentians and members of the Board shall refrain from engaging in any personal, business or intimate relationship with any of the Society’s residents or clients, during the course of employment, or while service is being provided. This prohibition will apply while the client or

residents are under the care of the Society and will continue for up to one year after the client or resident leaves the program.

Vincentian/Staff Interactions:

It is vital for the efficient operations of Greater Toronto Central Council and its' Special Works that the lines of authority established by the Board and Committees be respected. While Vincentians are always encouraged to participate in our Special Works, each staff may only take instruction from their designated supervisor. Special requests or recommendations should be communicated to the Executive Director or appropriate Chairperson.

Procedures for handling Personal Information:

1. The day to day information of residents, clients, Neighbours in Need, employees, volunteers and Vincentians including information on computer data bases, must be guarded against unauthorized access.
2. Confidential information stored electronically must be password protected.
3. Residents, clients and Neighbours in Need, will not be referred to by their full names, either in discussions or in writing. First names and initials are appropriate.
4. Requests for personal information from those outside the Society including Government, Law enforcement or other agencies will only be provided upon receipt of a warrant, or signed release.
5. Personal information on clients, residents or employees will be shredded after a period of inactivity for 7 years. Exception to this policy is for the residents who reside in the homes for adults with developmental disabilities as these files must be kept in perpetuity as per the directive of the Ministry of Children Community and Social Services.
6. Vincentians are to follow the Privacy Guidelines with respect to managing Neighbour In Need and client files.

Service Recipient Files and Documentation

Collecting and Storing Resident Information

The collection and storage of resident information shall be treated with the utmost confidentiality as detailed in each programs policy manual. Resident information collected shall be limited to that which fulfills the Society's contractual obligations with the funders, as well as relevant information which supports the case management plan for the individual. Files must be secured at all times in a room that shall remain locked when staff are not present. The use of a resident's name for the purposes of communicating resident information or status in house, shall be done by using the residents first name, or initials only. Procedures ensuring resident agreement for the transmission of information must be followed. Agreements or signed releases shall be kept in the residents file and updated periodically.

Removal of a resident file from the housing premises is strictly forbidden without the express approval of the Executive Director. In cases where a file is to be delivered to the Executive Director, it shall be sealed in an envelope and delivered by a manager or designate directly to the office of the Executive Director. Resident files that are to be archived shall be transported by the manager or designate directly to the Head Office at 240 Church Street for storage. Archived material must be treated with the same care and consideration as current files and are subject to the same level of confidentiality. Programs each have their own specific method for transporting and archiving files.

Collecting and Storing Neighbour's in Need Information

The collection and storage of resident information shall be treated with the utmost confidentiality as detailed in the GTCC Privacy Policy. Neighbour's in Need information collected shall be limited to that which supports the assistance plan for the individual. Files must be secured at all times. The use of a Neighbours name for the purposes of communicating information or status in house, shall be done by using the residents first name, or initials only.

In cases where assistance is no longer provided to a Neighbour, and a period of 7 years has passed, the file must be shredded prior to disposal. Archived material must be treated with the same care and consideration as current files and are subject to the same level of confidentiality.

Computer and Paper Files

Program Residents and Clients:

Documentation and statistical information collected electronically shall only be accessed through password protected programs on approved computers which are located at the facility where the resident resides. Managers and staff members are forbidden from collecting or storing resident information on portable computers.

Neighbours in Need:

Documentation and statistical information collected electronically shall only be accessed through password protected programs. Care will be taken to limit information to the most minimal necessary to conduct service. Virtual and written communications will not identify Neighbours by their full name and address. Care must be taken to restrict information that could compromise a person's well being in the event the information is misplaced or stolen.

Request to Review Files:

Program Residents

Residents shall have an opportunity to view their file in the presence of a manager, and shall be provided with copies of up to three pages on site. Requests for copies of the entire file shall be granted in extraordinary circumstances, within 5 business days, with the express approval of the Executive Director. A record of requests for file review shall be kept by the Program Manager.

Employees

Employees are permitted to review their file in the presence of a manger, and shall be provided with copies of up to three pages on site. Requests for copies of the entire file shall be granted in extraordinary circumstances, within 5 business days, with the express approval of the Executive Director. A record of requests for file review shall be kept by the Program Manager.