# CONFIDENTIALITY POLICY AND PROCEDURES

APPLICATION: Full-time and part-time classified, "at will" and hourly employees, (loaned representatives i.e. student interns, volunteers and leased employees).

### **PURPOSE:**

The Confidentiality Policy defines and describes the management of confidential information for all employees and loaned representatives of The Children's Home Society of NJ (CHSofNJ).

## **PHILOSPHY:**

We believe that client information is confidential and every safeguard should be taken to ensure information is kept confidential. The following guidelines are essential for the fostering of mutual trust and respect between CHSofNJ staff and the clients we work with. Clients are entitled to privacy and confidentiality, and staff must respect these rights by adhering to our standards of professionalism.

### **Responsibility and guidelines:**

- 1. All employees and loaned representatives shall keep confidential and shall not, during the continuance of their employment or any time after the termination thereof, without the express written consent of the CHSofNJ, disclose to any person or organization any client, financial or business information of CHSofNJ or any other information defined by HIPPA as protected health information (PHI), which an employee may have acquired during the course of employment.
- 2. Human Resource Director maintains the confidentiality agreements.
- 3. The Chief Executive Officer approves any changes to confidentiality agreements.

## **POLICY:**

All employees or loaned representatives of CHSofNJ, that come in contact with confidential information, both clinical and employee related, through, but not limited to, written records, documents, ledgers, internal correspondence and communications, computer programs and applications agree not to divulge or disclose to anyone other than those persons of CHSofNJ and/or its affiliates who have a "need to know" status, directly or indirectly, either during or after our services, any confidential information acquired during the course of our service. CHSofNJ, in addition to other legal remedies available to them, has the right to reprimand, suspend and/or terminate its employment or services.

#### Procedure

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- All employees and loaned representatives will respect client rights to privacy and confidentiality. This means that, a) files should only be open to those staff persons needing or providing information for file maintenance, documentation, or services, (b) discussion of clients and case consultation should remain between the staff person(s) directly involved with the clients and (c) files are to be maintained in a secure manner.
- 2. No client identifying information will be transmitted electronically (email) unless encrypted.
- 3. All employees and loaned representatives shall sign an Agreement of Confidentiality which shall be maintained in their Personnel File.

#### **Acknowledgment and Receipt Form:**

This is to acknowledge that I have received a copy of The Children's Home Society of N.J. "Confidentiality Policy and Procedures", and that I have read and understand the policy.

Signed:

Signature

Date

Name (printed)

(Designated Management Staff Member)

Date