

Policy: Confidentiality of Protected Information

1 Definition: Protected Information: Any medical, personal health information, social, referral, personal (including home addresses, telephone numbers, fax numbers, e-mail addresses and demographics), or financial information about a client, volunteer, board or committee member, donor, contractor, or another individual employed by or associated with SIRE that is collected by or provided to SIRE.

2. Policy: It is the policy of SIRE to protect and preserve all Protected Information related to, and the privacy of, client riders of SIRE, whether or not currently enrolled in a SIRE program, client family members, and other individuals employed by or associated with SIRE including, but not limited to, board and committee members, donors, volunteers, staff (full-time, part time, and temporary employees), and independent contractors. This policy is not intended to prevent disclosure where disclosure is required by law.

3. Applies to: The provisions of this policy apply to all board, committee and staff members, volunteers and independent contractors of SIRE. They may not disclose, divulge, or purposely or inadvertently gain unauthorized access to or make accessible confidential Protected Information, belonging to, or obtained through their affiliation with SIRE to any person, including relatives, friends, and business and professional associates.

2. Confidentiality: Board, committee and staff members and volunteers shall use Protected Information solely for the purpose of performing services as a board, committee or staff member or volunteer for SIRE and they must exercise good judgment and care at all times to avoid unauthorized or improper disclosures of confidential information. This information must be kept confidential both during and after his/her term of service or employment. Mailing addresses, email addresses, and telephone numbers may be used by SIRE for SIRE purposes, announcements, or events, but will not be used for any other purpose or made available to any other person or organization. . In this day of advanced technology, it is critical to take into account all media which may contain any Protected Information whether personal or SIRE property (i.e. smart phones, tablets, PCs, etc.) and take all reasonable and necessary precautions to not maintain Protected Information on such devices and/or secure such devices with protection software, passwords and the like.

3. Authorization: SIRE will not use or disclose Protected Information without first obtaining authorization for such use or disclosure from the subject individual. SIRE will maintain a signed document from each client and each volunteer that defines whether SIRE can or cannot use photographs or videos of the respective client or volunteer. SIRE will maintain a “no-photo/no-video” list, and not use photographs or videos of the client or volunteer except as authorized by the client or volunteer.

4. Children Under 18: Individuals under the age of 18 do not have the legal authority to authorize the use or disclosure of their Protected Information. Before SIRE uses or discloses Protected Information about an individual under the age of 18, SIRE will obtain an authorization for such use or disclosure from the individual's parent(s) or legally authorized representative.

5. Executive Sessions of Board Meetings: The minutes of the board meeting shall indicate when the board goes into executive session but shall not normally reflect any of the topics or discussion that occurs in executive session. However, when the board takes an action in executive session that needs to be recorded, the Board President will provide any such text that is to be included in the official minutes of the meeting.

6. Anonymous Donations: When a donor requests that his or her gift be treated as an anonymous gift, the donor's wishes are to be honored by board, committee and staff members and volunteers.

7. Donors: All board, committee and staff members and volunteers shall adhere to the principle that all donor and prospect information created by, or on behalf of, SIRE, is the property of SIRE and shall not be transferred or utilized except on the authorized behalf of SIRE.

8. Violations: An individual who suspects, believes or knows his/her information has not been maintained in accordance with this policy should immediately notify the Executive Director.

9. Disciplinary Action: A violation of this policy, either purposely, or through a failure to exercise reasonable care, may result in disciplinary action, up to and including termination or removal. All board, committee and staff members or volunteers are required to return any such privileged or confidential information in any form at the time of their expiration of service or termination of employment, whether voluntary or involuntary. Breaches of confidentiality after one's term of service or employment may be subject to legal or criminal action.

Approved July 31, 2012