



SECTION: Board **POLICY:** Confidentiality & Privacy
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REVIEWED: Oct/19, Dec/23 **NEXT REVIEW:** Dec/27

POLICY:

Community Care Northumberland (CCN) is committed to maintaining the confidentiality of client, resident, and agency information, regardless of the medium (written, verbal/electronic).

All Community Care Northumberland affairs are confidential and under no circumstances may information concerning clients, residents, volunteers, employees or the operation and affairs of CCN be discussed with anyone other than those people concerned in the discharge of their duties.

Community Care Northumberland's employees and volunteers must adhere to the criteria outlined below to ensure the protection of confidential information and must sign the Statement of Confidentiality and Privacy as a condition of employment/volunteering.

All providers, suppliers and contractors doing business or partnering with CCN who may have access to confidential information must sign the Community Care Northumberland Confidentiality & Privacy Agreement prior to commencing work or partnering with the organization.

Violation of confidentiality or data security breaches may result in disciplinary action, up to and including termination of employment, volunteer placement or contract for services, charges under the Federal or Provincial Privacy Legislation, or similar action appropriate with the association with Community Care Northumberland.

PROCEDURE:

It is a condition that all Community Care Northumberland employees and volunteers or any other person having an affiliation with the organization prior to receiving access to any confidential information, must receive education on the requirements of confidentiality and sign a Confidentiality & Privacy agreement (attached below). Where relevant, reviewing and understanding of all CCN Privacy and Security policies will be completed during the orientation to the employee/volunteer position.

Client Information

It is the duty of all employees & volunteers to maintain the confidentiality of information belonging to or relating to Community Care Northumberland or its clients/residents served.



Confidentiality and the right to privacy of information is upheld in all forms of communication (verbal, written, electronic) at Community Care Northumberland. Staff and volunteers are to ensure confidentiality at all times by:

- Avoiding use of the names of resident/client/family/program participants except where relevant when discussing cases;
- Avoiding the discussion of cases or other confidential communications in communal spaces;
- Aiding each other in avoiding potential and actual breaches of confidentiality;
- Never discussing residents, clients, families or program participants outside of the organization including the fact that someone is a resident, client, family member or program participant.
- Avoiding any description of a resident/client condition, age, diagnosis, family composition
- All employees and volunteers will be made aware of who to report a breach of information upon their orientation and through the review and understanding of CCN Privacy and Security policies.

Use of Social Media

This Confidentiality and Privacy Policy applies to all social media platforms that include but are not limited to: Facebook, Instagram, X, YouTube, TikTok, LinkedIn etc. This applies whether posts are made to web pages that are broadly accessible to the public or to web pages that are only accessible to a limited number of invitees. It includes all forms of posting including but not limited to: articles, artwork, photographs, videos, graphic design, blogs and other such interactive media forms.

The use of social media by Community Care Northumberland employees and volunteers must be consistent with all Community Care Northumberland's policies and procedures, directives of professional colleges, and applicable legislation, including those concerning privacy, code of conduct, conflict of interest, harassment and discrimination in the workplace.

Compliance to all copyright and/or intellectual property right laws must be upheld when publishing to a social media site. Any concerns or issues that arise from the use of social media that is not addressed in the Confidentiality Policy are the responsibility of Community Care Northumberland's Chief Executive Officer and/or the Board of Directors.

LEGISLATION

Community Care Northumberland is considered a Health Information Custodian (HIC), an organization that provides care within the health care continuum. Staff and volunteers who receive health care information are agents of HICs and must comply with all legislation.

Personal health information can be shared among Community Care Northumberland members to facilitate seamless and effective care (Personal Information Protection Act (PHIPA), 2004). CCN complies



with the Health Information Protection Act, 2004, comprised of both the Personal Health Information Protection Act and the Quality of Care Information Protection Act (2004).

A signed copy of the Confidentiality and Privacy Agreement will be placed in the employees and/or volunteers file.

Statement of Confidentiality & Privacy Agreement

Name: _____
(Please Print)

Affiliation with CCN: _____
(e.g. employee, volunteer, board member, contractor)

As an employee or volunteer of Community Care Northumberland, I will respect and maintain the confidentiality of information gained as an employee/volunteer, including but not limited to, all computer software and files, all business documents and printouts, and all volunteer, employee, resident, client, donor and supporter records.

I will ensure that private and confidential information is not inappropriately accessed, used or disclosed either directly by me, or by virtue of my password to systems.

I understand that breach of confidentiality includes but is not limited to accessing client and financial information without authorization to do so without the need to know for direct client service/care or performance of one's duties. Violations include but are not limited to:

- Accessing information not required for job/duty purposes;
- Misusing, disclosing without proper authorization, or altering client, volunteer or employee information;
- Disclosing to another person my user name and/or password for accessing electronic records;
- Misusing or disclosing personal information without proper authorization on any social media outlets (i.e. Facebook, X, Instagram, YouTube, Tiktok, LinkedIn etc.),

I understand and agree to abide by the conditions as outlined in this agreement, which will remain in force even though I may cease my volunteer or employment status with the organization.

I agree to abide by the confidentiality rules stated above and understand that this is a condition of my employment or volunteer role. I understand that a violation of this agreement may be grounds for immediate dismissal for just cause without notice or pay in lieu of notice.

This agreement and policy will be reviewed and signed on an annual basis with a copy kept in the employee/volunteer file.

Name (please print)

Signature

Date