



TITLE: CONFIDENTIALITY

Policy 1.2
Rev. July 2023

PURPOSE AND SCOPE

The purpose of this policy is to ensure the confidentiality of personal information, both employee and client.

A. CLIENT RECORDS

All client information is confidential. No information, whether written or verbal, will be transferred to a third party without a written release of information signed by the client or legal guardian or unless such a release is authorized by a lawful court order.

1. Copies of all current releases should be kept in the client's file in the office. Releases will be reviewed and signed by the client and/or legal representative annually or as needed to initiate a new release.
2. At hire all employees will be trained by Kokua on the Health Insurance Portability and Accountability Act (HIPAA) and must read and sign a confidentiality statement acknowledging the expectation of strict confidentiality as regards to client information.
3. Any unneeded printed material containing client information must be kept in properly labeled shred bins within locked offices and transported to the LeMay shred bin in the back of the B1 office for proper destruction.
4. Client information in electronic format may only be stored on secured Kokua computers (rare occasion) or within the Kokua Tresorit account and/or secure Therap account (preferred). Employees are not permitted to have any Kokua documentation, client photographs or client information on personal devices including, but not limited to, flash drives, lap tops, smart phones or tablets. *See Therap policy regarding use of that secure system.*

Breaching client confidentiality is a serious policy violation and may be cause for disciplinary action up to, or including, termination.

B. EMPLOYEE RECORDS

Employee personnel records are confidential. Access to personnel records is limited to the Executive Director, Client Programs Director, Administrative Assistant, Kokua Human Resources staff and the Business Operations Coordinator.

No information from employee records will be shared with a third party without a written release of information from the employee or by a lawful court order. Exception to this rule allowed for DDA or RCS evaluations, investigations and follow-ups.

Employees may have access to copies of their personnel file upon written request. Names of clients, third parties or potentially identifying circumstances must be redacted before the documents are released. Any excess printed

material containing employee information must be put in the locked shredding bin to await disposal.

C. CONFIDENTIALITY

All office personnel will sign a copy of the Administrative Confidentiality Statement at the time of hire.