

PATHWAYS ABILITIES SOCIETY

PROCEDURE: CONFIDENTIALITY AND RELEASE OF PERSONAL INFORMATION

Applies to: All Personnel, Volunteers, Contractors and Tenants

Original Effective Date: 1993

Effective Date: July 29, 2024

Replaces Procedure Dated: July 10, 2023

Person's Served

1. The Community Placement Developer (CPD) or designate provides new referrals and/or their designate with a Community Support and Consent form to read and sign prior to completing the Pathways Abilities Society application form.
2. The CPD or designate ensures the Community Support and Consent form is read and signed annually.
3. Information regarding a person served, is only released to those who need to know and with prior approval from the supervisor.
4. Staff read, understand and only release the information as outlined.

Employees

1. The executive director or designate provides new employees with a Confidentiality Statement and Use of Confidential Material Off-Site Agreement Statement form to read and sign upon hire.
2. Employees electronically sign the Confidentiality Statement and Use of Confidential Material Off-Site Agreement Statement annually thereafter in January at their evaluation. The original document is kept in their employee file.
3. New employees complete the CLBC online privacy training.

Volunteers

1. The executive director or designate provides new volunteers with a Confidentiality Statement and Use of Confidential Material Off-Site Agreement Statement form to read and sign upon hire.
2. Volunteers sign the Confidentiality Statement and Use of Confidential Material Off-Site Agreement Statement annually thereafter in March.
3. New volunteers complete the CLBC-On-line privacy training if they access files of individuals served in the course of their duties.

Requests for Information

1. When confidential information is requested from employees, volunteers and tenants state they are not authorized to release any information concerning an individual or the

society's affairs and refer the person requesting the information to the executive director or designate.

2. Information requests from newspapers and other public news organizations are referred to as stated in the Media policy.

3. The executive director or designate ensures that prior to releasing confidential individual information, the procedures are followed.

4. Information about individuals may be released on a strictly need-to-know basis to family members who inquire when the person cannot properly inform the family and such action is in the person's best interest and with prior approval from the supervisor.

Taking Confidential Information Off Site

1. Employees who need to take confidential information off-site are required to adhere to the Confidentiality and the Borrowing Equipment, Material and Vehicles policies and complete the Borrowing Equipment/ Materials Terms form.

2. Employees must return confidential information to their secured location, which is confirmed by their immediate supervisor.

References: Employment, Volunteer and Home Share Contractor Tenant

1. An employee, volunteer, home share contractor or tenant wanting to use Pathways as a reference, contact their immediate supervisor or area manager, who completes the appropriate, relevant Pathways Abilities Society Employment Reference-Internal form.

2. The supervisor:

- Reviews the completed form with the People and Culture Manager or the Executive Director.
- Contacts the employee or volunteer to review and present the form.

3. The manager:

- Reviews the completed form with the Executive Director.
- Contacts the tenant or contractor to review and present the form.

4. The person signs the completed form confirming they agree with the reference summary.

5. The supervisor or manager gives the completed form to the executive director. They do not give the person a copy of the completed form.

6. The employee, volunteer or tenant instructs the person requiring the reference to contact the executive director or their designate. The information provided on the form is the only information that will be released.

7. When a request for the release of information is received, and the employee, volunteer, contractor or tenant has not authorized the employer to release the information, Pathways will respond to the inquirer with a statement, "it is not the organization's policy to give out information without the employee's prior approval."

8. The executive director:

- Places the form in the appropriate section of the Reference binder.
- Responds to the inquires.
- When away for an extended period of time, gives the binder to the finance manager who releases the information.

Post-secondary programs or educational opportunities Employment and Volunteer reference

1. An employee or volunteer wanting to use Pathways as a reference to support their application to a post-secondary education program contacts the manager responsible for volunteers.

2. The manager or designate:

- Completes the documentation required.
- Obtains approval from the executive director.
- Makes a copy and provides the executive or designate with a copy for their file.
- Releases the information.

Violation of Policy

1. Employees or volunteers perceiving or witnessing a violation of the Confidentiality and Release of Information policy will utilize the Conflict Resolution policy and procedures.