

## GARRETT-KEYSER-BUTLER COMMUNITY HEAD START

### CONFIDENTIALITY POLICY

Maintaining client confidentiality is the primary step in building a relationship of mutual trust between clients and staff. To this end and to be in compliance with the HIPAA Laws, the Garrett-Keyser-Butler Community Head Start Program has established the following policies and procedures.

All staff are instructed in the importance of confidentiality of client information at the time of orientation for their employment positions, and throughout the rest of their employment in this program. The need for confidentiality is addressed in the Personnel Policies of this program, and consequences for violation of the policy are explained.

To achieve confidentiality of client information, the following steps will be taken by all staff:

1. All child files and records will remain in locked file cabinets when not directly in use. Child records include, but are not limited to testing or screening results, health records, anecdotal records, health screening and exam results, attendance records, applications, progress reports and IEP's.
2. Posted charts for rotating turns, etc., and posted art work may list the child's first name, but not first and last name.
3. Head Start newspaper, public newspapers, and radio or television announcements will list the child's name according to the permission slip signed by custodial adults. Pictures will not be printed without permission.
4. Client and staff conferences will be held in a location which offers privacy. Necessary staffings sharing information about clients between staff members will also be held in locations which offer privacy.
5. Staff members will not discuss client concerns when meeting in public places, i.e., restaurants, etc.

6. Staff member will not discuss client concerns with other staff members, volunteers, students, etc. who are not directly involved with that client.
7. Staff members will not discuss information concerning any client with another client who is not an immediate member of the first client's family, i.e., spouse.
8. Confidentiality requirements are discussed with clients at the time of orientation. Information is provided in the Parent Handbook.
9. Confidentiality is also required for staff concerns. No staff member will discuss the job performance, or personal matters as they relate to fellow staff members with anyone, in the program, or outside of the program. Employees will not question each other regarding personal issues.
10. Staff records, including job evaluations and other personal information are kept in a locked, personnel filing cabinet. The Head Start Program Director has sole access to these files. Physical examinations are kept in a separate locked file.
11. Confidential information on all persons associated with the Head Start Program including staff, volunteers, parents and children, is only shared as stated in the HIPAA Notice of Privacy Practices.