



Confidentiality Policy

Best Practice Resources – Program Operations

The primary source for this sample policy is the Generic Mentoring Program Policy & Procedure published by Education Northwest.¹ Please refer to your governing board and/or legal counsel when defining your organization's confidentiality policy.

Confidentiality Policy

(Insert name of agency) is committed to protecting the confidentiality of participants and families. Participant information including names, written-records, pictures, etc., is strictly confidential for use by *(insert name of agency)* or our professional staff. Participant information is considered the property of the agency not the agency staff, and is subsequently not available for review by mentors, mentees, and/or parents/guardians. Any confidential information about a youth, family or volunteer shall be held in confidence with the exception of the limitations included below.

Limits of Confidentiality:

- Information that is gathered from program participants, written or otherwise shared about themselves and/or their families in applying to and or participating in the program may be shared with other individuals or organizations only upon receipt of a signed "release of information" from the applicable participant.
- Mentor, mentee, and parent/guardian identifying information including names, photographs, videos etc. may be utilized in *(insert name of agency)* publication materials only upon the receipt of written consent from the individual.
- Confidential information will be made available to law enforcement officials or the courts with a valid and enforceable subpoena. The executive director and program manager shall be notified immediately upon any such legal request for information.
- Agency employees are mandatory reporters and are required by law to disclose any information indicating a youth may be abused, neglected, in danger, or intends to harm him/herself or others.
- When staff or a volunteer becomes aware of a medical emergency any necessary information may be provided to satisfy appropriate treatment of the condition.
- Should a staff member receive information that a volunteer has violated the program participation agreement by committing a crime, using illegal substances, committing a driving infraction, inappropriately abusing alcohol or other controlled substances, such information will be disclosed to the parent of the matched youth at which point the parent will have the option to close the existing match.

- As the program considers appropriate match candidates information about the individuals can be shared with prospective parties with the understanding that the full identity of the prospective match mate will not be revealed until all parties agree to participate in the mentoring relationship. Information shared before matching may include:
 - Mentees: age, sex, race, religion, interests, hobbies, family situation, a summary of youth's eligibility for the program, and expectations for the mentoring relationship.
 - Mentors: age, sex, race, religion, interests, hobbies, employment, marriage or family situation, sexual preference, motivation for mentoring as well as results of driving record and background check.

Safekeeping of Confidential Records

Confidential program participation information from mentors, mentees and families shall be stored in a locked file secured from unauthorized intrusion. The executive director is considered the guardian of confidential information. He/she is responsible for all confidential records including supervision, management, safekeeping, accuracy, and accountability to board policies. All program staff, volunteers, youth participants and parents shall be informed of the scope of and limitations regarding confidentiality and must sign a Confidentiality Agreement. Mentors are also required to keep information about their mentee and his or her family confidential. A violation of this confidentiality policy by a staff member will result in disciplinary action and may range depending on the seriousness of the infraction from a written warning to termination.

ⁱ Ballasy, L., Fullop, M., & Garringer, M. *Generic Mentoring Program Policy and Procedure Manual*. The Hamilton Fish Institute on School and Community Violence & The National Mentoring Center at Northwest Regional Education Laboratory. Sept. 2007. Available online at: http://educationnorthwest.org/webfm_send/174