

# Confidentiality

Policy 1506

Revised: January 31, 2021

## Purpose

Maintaining the confidentiality of all sensitive information regarding **BRPC**, its clients, **Team Members**, partners, and donors is of the utmost importance. **BRPC** recognizes that one of the most important aspects of working with at-risk populations is protecting sensitive information. **BRPC** and its **Team Members** are also obligated under federal and state law to protect certain confidential information. Therefore, **BRPC** has adopted the following policy which applies to all **BRPC Team Members**.

## Definitions

- ❑ **BRPC Constituents:** Includes all individuals and organizations who have a past, present, or targeted relationship with **BRPC**. These include clients, donors, **Team Members**, contractors, and alumni. They include organizations, groups, and individuals.
- ❑ **Sensitive Information:** Many of our policies are designed to protect and preserve information. We distinguish between three types:
  - **Proprietary Information:** All information gathered and developed by **BRPC** that is not readily available for free and in a similar format from public resources.
  - **Personal Identifiers:** Information that can be used to identify, locate, or contact a person (e.g., name, phone, address, email).
  - **Confidential Information:** Details generally considered private by constituents (e.g., financial information, transaction details, medical history, sexuality, gender identity, family information; survey responses).

## Access to and Use of Sensitive Information

- ❑ **All Sensitive Information:** **BRPC Team Members** may only be granted access to Sensitive Information as needed to conduct **BRPC** business. They may not download, save, use, share, or print Sensitive Information except where required to complete assigned activities. They may not retain Sensitive Information following their term of service to **BRPC**.
- ❑ **Proprietary Information** is considered the property of **BRPC** and is not to be used, shared, or stored, except for **BRPC** purposes. It should never be shared, even with partners, without the express approval of the **Executive Director**.
- ❑ **Personal Identifiers** are not to be shared or used, except as needed to perform approved **BRPC** activities. Such information should never be shared externally unless expressly authorized when collected.
- ❑ **Confidential Information** should never be shared or used except as expressly authorized or understood by the person the information pertains to. Confidential Information may not be disclosed without a signed release form from the constituent except for the following instances: medical emergencies that present an immediate threat; reporting abuse of people unable to fend for themselves; reporting a felony. In such cases, relevant information should be shared with an appropriate health care, social services, or law enforcement professional.

## Confidentiality Agreement

Any **BRPC Team Members** likely to have access to sensitive information while working for **BRPC** must sign a Confidentiality Agreement. **Team Members** who have limited roles, such as booth volunteers at **BRPC** events do not need to sign a Confidentiality Agreement.

## Examples

Some common situations are set out below. This list is illustrative only and should not be regarded as all-inclusive:

- ❑ **Team Members' Personal Contact Information** (email, phone, social media) should never be shared without their permission. These are personal identifiers.
- ❑ **Program Participants:** **Team Members** should never reveal who is participating in a **BRPC** program or service without authorization. Some people and organizations consider their mere participation in a project a matter of confidence.
- ❑ **Organization Addresses:** At-risk groups are often sensitive to sharing location information publicly. This poses a security risk. Never share or publish addresses (or other identifiers) without authorization.

- ❑ **Donor Information:** **BRPC Team Members** may NOT reveal donor identity to anyone without the express written permission of the individual being recognized. Contributor confidentiality does not extend to grant funders, sponsors, and other organizational bodies who contribute money to **BRPC**.
- ❑ **Inappropriate Use:** Don't assume that information gathered for one project or program can be used to promote another project or program. We want users to trust that we will not exploit the information they share for unrelated purposes. If in doubt, check with the **Executive Director** or the **Program Director** who collected the information.

### Questions

Questions regarding constituent information should be directed to the **Executive Director**, or **Board President**.