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EIN: 30-0438142

*Mission: To build on the strengths of refugee and immigrant communities and remove barriers to achieving economic, social, and cultural wellbeing.*

## **Client Confidentiality & Data Privacy**

Understanding confidentiality and data privacy issues is one of the most critical aspects of your work. It is your legal responsibility to observe and protect the rights of your clients and their families with regard to data that they have a legal right to expect will be kept confidential and dealt with in a professional manner. Failure to do this can result in problems for the client, KOM, the other staff that you work with, and also can result in disciplinary action that could impact your employment status.

Only staff and volunteers/interns who are responsible for the preparation and delivery of related services, or who have a responsibility for protecting the health, safety, and welfare of the client may have access to written or oral information regarding the client. These individuals must treat this information in a professional manner, and be aware that federal and state law, as well as state and local policies protect the data privacy rights of the client and their families.

## **Basic Guidelines**

- Do not share information about clients or their families with staff who are not involved in delivering services to that client or with anyone outside of the organization. This includes written, oral, and electronic information in the office or in the community.
- Never refer to clients by name or by any other identifying information in a staff meeting, conference setting, or with other clients and community members.
- Access individual client records through the proper procedures, with authorization, and for the sole purpose of completing your work.
- Secure all files with personal information in locked drawers in your office or on KOM's secured Microsoft Exchange folders and databases. Do not store any client information on your desktop, personal computer, cell phone, or in unsecured locations.
- Do not speak to clients about personal information in the lobby or in community settings where other people can overhear. Never use speakerphone when talking to a client.
- Speak and write responsibly and professionally when passing on information related to your work with clients, with an awareness of who may hear you or read your report.
- Take questions you may have about KOM policies on confidentiality to your immediate supervisor.



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## **Organization Confidential Information**

Many of our employees have been placed in a position of trust because of the work they perform. Some are exposed to or have access to KOM funds, employee payroll data, personnel records, client records, credit management, vendor contracts, corporate/ individual donor information, computerized information, financial information, and other types of sensitive information that is considered confidential in nature.

Protecting our organization's information is the responsibility of every employee. Do not discuss KOM's confidential business or proprietary business matters, or share confidential information as described above, with anyone within the organization who does not have a need to know or with anyone who does not work for KOM such as friends, family members, members of the media, or other business entities. This includes not sharing confidential information with former KOM employees.

Nothing in this policy shall be construed to permit an employee to disclose, copy, use, or transfer trade secrets or proprietary materials of the organization or others without appropriate authorization.

You are reminded that revealing any type of confidential information to unauthorized persons, tampering with, or altering KOM records and/or property is a violation of that trust which can result in disciplinary action, up to and possibly including termination of employment.

Confidential information does not include information pertaining to the terms and conditions of an employee's employment, including wages. Nothing in this policy is designed to limit an employee's rights under Section 7 of the National Labor Relations Act.

The organization's mailing address shall not be used for the receipt of personal mail without express permission from an Executive Director.

Should you have doubts about what is considered confidential information or a violation of trust, you should seek advice from your supervisor.