

CONFIDENTIALITY AND PRIVACY

Applicability: This policy applies to all Oak Hill employees.

All Oak Hill employees are required to respect the privacy of program participants, family members, fellow employees and volunteers. In addition, Oak Hill employees shall maintain the confidentiality of the following records, documents and other information, whether in electronic, paper or other format:

- a. All information relating to students and program participants.
- b. Personnel, health, disciplinary and other protected information relating to Oak Hill employees.
- c. Financial, strategic, and other proprietary information relating to Oak Hill's programs and operations.
- d. Any information the disclosure of which would violate state or federal law.

Oak Hill employees may only disclose, remove, photocopy, email or otherwise distribute such protected information (1) as required by their job duties and responsibilities, (2) to other Oak Hill employees on a "need to know" basis, (3) pursuant to any contractual obligation with an applicable state, federal or local agency and (4) as may be otherwise required by another Oak Hill policy or state or federal law. No employee may use any such protected information for personal use or financial gain. If any employee has a question or concern about what information may or may not be disclosed, he/she should consult with his/her supervisor or department head.

Oak Hill and its employees are required to comply with all applicable state and federal laws governing privacy and confidentiality including, but not limited to: the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Americans with Disabilities Act (ADA), the Individuals with Disabilities Education Act (IDEA), the Family Educational Rights and Privacy Act (FERPA – Buckley Amendment), and the Connecticut Personnel Files Act.

Any violation of this policy shall be considered a serious offense and may result in discipline up to and including discharge.

Cross-Reference: HIPAA Policies
Discipline and Discharge
Privacy Protection Policy

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