



Confidentiality Policy

As per contractual requirements, Turning Point staff must comply with FIPPA in respect to the collection, access, use, disclosure, and disposal of clients' personal information.

Collection

1. Employees may only collect personal information for:
 - a. Purposes directly related to and necessary for an operation program or activity of Turning Point
 - b. Law enforcement purposes
 - c. As otherwise authorized by law
2. Employees may not collect more personal information than is required to fulfill the purpose for which the information is being collected.
3. Where possible, staff is to collect personal information **directly** from the client. The client must be informed:
 - a. Why the information is being collected
 - b. How it will be used and/or disclosed by Turning Point staff
 - c. The legal authority for its collection
 - d. The contact information for the Turning Point employee to contact if the client has any questions about the information collection
4. Staff should only collect client personal information **indirectly** from other sources in the following circumstances:
 - a. From someone other than the client (friends, family, etc) if necessary to provide medical treatment
 - b. For law enforcement purposes
 - c. If the client the information is about consents to such indirect collection
5. Staff is required to disseminate to client's information about the collection, use, and sharing of their personal information ("Privacy & Freedom of Information").
6. Staff is responsible for obtaining from clients written consent to collect personal information indirectly from other sources ("Authorization for Release of Information II").

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Use

Employees are authorized to access and use client personal information for legitimate purposes only. Legitimate purposes are based upon the “need to know” in order to complete the following primary job duties:

- a. The provision of care to clients
 - b. Administrative and other support functions related to direct care
2. Staff may also use client personal information for purposes **related** to the above primary purposes, only if the purpose has a **reasonable and direct connection** to the provision of health care services and is required for operating Turning Point programs. Secondary purposes include:
- a. Program evaluation and monitoring, including quality improvement
 - b. System administration
 - c. Privacy and security audits
 - d. Medical education and training related to Turning Point programs

Disclosure

1. Staff may disclose client personal information to external parties only under the following conditions:
 - In cases of suspected child abuse, staff is obligated to inform appropriate staff in the Ministry for Children and Families.
 - Upon subpoena to court and at the discretion of a judge, staff is required to testify. However, staff has the option of advising the court that the information is confidential and to ask that the information not be published or that publication be restricted.
 - The Executive Director determines that compelling circumstances exist that may affect anyone’s health and safety. Notice of disclosure for this purpose must be provided to the client the information is about, unless the Executive Director considers that giving this notice could harm someone’s health or safety.
 - In order to reduce the risk of domestic violence, if domestic violence is reasonably likely to occur.
 - In cases where a client is injured, ill, or deceased, his or her next of kin or a friend may be contacted.
 - Between staff within the security of the administration and treatment system of Vancouver Coastal Health (VCH) Addictions programs and other referring agents only when necessary to coordinate or plan or conduct the client’s treatment. The exchange of information may be between employees, Turning Point Recovery Society and employees of VCH or funded agencies,

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or between employees of Turning Point Recovery Society and employees of other agencies professionally involved with the client or collateral.

- Non-identifiable data may be made available for research according to the conditions outlined in the Society's policy manual.
 - In accordance with another municipal, provincial or federal Act or Regulation.
2. Access to client files and information on clients is restricted within Turning Point's service for the purposes of treatment and supervision only.
 3. Client files are not to be transferred; however, summaries may be transferred with written consent of the client.
 4. Staff is required to disseminate to client's information regarding the limits to the confidentiality of their personal information and the disclosure of that information ("Exchange of Information" form).
 5. Staff is responsible for obtaining from clients written consent to release information to select third parties ("Authorization for Release of Information I")

Retention

1. Client records must be retained indefinitely.