

## **YOUR CHOICE PREGNANCY RESOURCE CENTER**

### Privacy Policy

(Last updated: May 2, 2024)

### **GENERAL GUIDELINES**

Your Choice Pregnancy Resource Center values the protection of confidential information. During the course of service, a staff member or volunteer may learn confidential information, such as personal or medical matters affecting the lives of clients served. However, unauthorized sharing of such information is not permissible.

### **CLIENT CONFIDENTIALITY**

Your Choice Pregnancy Resource Center offers all services with the assurance of keeping all identifying information confidential. To ensure all Your Choice Resource Pregnancy Center's staff, volunteers and clients uphold confidentiality; the following guidelines are expected and enforced:

- Staff and volunteers are required to maintain the seriousness of confidentiality.
- Client information/situation is not shared for referral(s) with other agencies, physicians, etc., without his/her prior written consent to do so. (The "Release of Information" form is for this purpose).
- At no time is client information disclosed in the name of concern to church members, family members or prayer chains. (Your Choice Resource Center's prayer requests never uses client names and always keeps requests very general so as not to betray a client's confidentiality).
- Client appointment book, slips, scheduler and client files must never be in view of visitors and clients. These items are required to be non-visible to visitors and clients at all times.
- By no means are inquiries or information about client appointments shared with a third party unless there is a written and signed agreement on file by the client granting permission. (The Client Services Specialist and Client Services Director are to ensure this).
- Clients are softly spoken to in the Client Advocate rooms, receptionist area, and lobby to prevent information concerning a client from being overheard by visitors and/or other clients.
- Client information is never to be generally discussed with an internal staff member or volunteer except for the Client Services Director, Medical Services Director, Executive Director, or staff needing client information necessary to carry out his/her job responsibilities.
- Clients are required to provide proof of valid identification when completing mobile forms or at check-in for an initial visit appointment. Clients are asked to also provide a profile picture solely for the purpose of immediate identification during visits to Your Choice Resource Pregnancy Center. Profile pictures are not disclosed to guests, clients, or third parties. *See example below.*

- Your Choice Resource Center has the right to remove or edit profile pictures that are not a clear headshot or that do not meet modest expectations.



## CLIENT CONFIDENTIALITY EXCEPTIONS

Every client seen at Your Choice Pregnancy Resource Center is promised confidential, compassionate care and every center team member has a duty to uphold confidentiality, unless an exception applies. Some exceptions include when disclosure is required by law, or there exists morally compelling circumstances to break confidentiality, or when necessary to protect the client or others from serious, foreseeable, and imminent bodily harm, or when the center is engaged in a criminal or civil dispute with the client. In all other situations, client information, including identity, will only be shared with the client’s written permission.

Every client must sign a ***Request for Services*** form acknowledging their understanding of Your Choice Pregnancy Resource Center’s promise of confidentiality and its limitations prior to beginning to receive services at the center. This form includes the following disclaimer:

*This center holds in strict confidence the information you provide with the following exceptions: Due to concern for your safety and/or state law, we are required to report knowledge of a client who is suicidal, homicidal, abusing a minor, a minor being abused, or a victim of statutory rape, or when otherwise required to disclose such information by law.*

## EXPLANATION OF EXCEPTIONS TO CLIENT CONFIDENTIALITY

***Subpoenas***—Center personnel shall comply with subpoenas for client information.

***Public Health***—Center personnel shall release client information related to infectious diseases as required to the appropriate public health agency.

***Suicide/Homicide***—Center personnel shall report to law enforcement credible threats of suicidal or homicidal intentions.

***Child Abuse/Neglect or Elder Abuse/Neglect***—Center personnel shall act as mandatory reports under state law, reporting suspicions of child abuse or neglect to law enforcement and / or the appropriate child protection agency.

***Fake Clients***—When it has been confirmed beyond a reasonable doubt that the “client” has obtained services under false pretenses, such as using the visit to produce an untruthful report on behalf of a pro-abortion advocacy organization, Your Choice Pregnancy Resource Center may disclose the circumstances of the visit to the extent necessary to defend our practices from falsehoods.

***Legal Disputes with the Center***—When the client has committed some crime against the center or is posing a threat to center personnel, or when the client has filed a lawsuit against the center, the center may disclose that information which is necessary to defend.

## **ACCESS TO CLIENT INFORMATION**

Client files and personally identifying information shall be maintained securely. Only personnel having a legitimate need may access this information.

Hard copy files shall be stored in a lockable filing cabinet. When the center is closed, all client files shall be locked at the end of each business day. When the filing cabinet is unlocked, access to the files should be supervised by authorized personnel who can ensure they are only accessed by other authorized individuals. Keys shall only be available to center personnel who are authorized to access the files.

Electronic files shall be password protected and accessible only through a password protected computer. Passwords should be difficult to guess and never stored where they may be accessed by unauthorized persons.

Under no circumstances may hard copy information leave the center premises nor may electronic information be shared with unauthorized persons.

When anyone other than a client requests information concerning a client, including verification of the identity of a client, that request will be refused unless the client’s written permission has been obtained or a subpoena or court order is issued. Client information is not given over the phone to anyone unless written permission has been obtained (this includes relatives, partners, medical personnel, government agents, etc.).

## **CLIENT RECORD RETENTION & INTEGRITY**

Your Choice Pregnancy Resource Center shall maintain the original record of each client for seven years. Under no circumstances shall this record be destroyed or altered prior to that time. After that time, the client’s record will be securely destroyed.

## **RELEASE OF CLIENT INFORMATION**

A client requesting a copy of their own records or requesting that the record or any portion thereof be released to a third party shall make that request in writing, specifying what portion of the record is to be released, and when the permission to share the record expires, prior to the center releasing any copy of the record. Your Choice Pregnancy Resource Center shall make an authorization to release information form available to the client for this request and the center will also accept any equivalent form from another agency, institution, or health care provider. Along with the written request, the center shall verify the client's identity by (a) requesting a copy of the client's government issued photo identification, and/or (b) comparing the signature on the written request with the client's signature on another form in the client's file. A copy of the authorization to release information form is maintained in the client's file.

Within Your Choice Pregnancy Resource Center, confidential client identifying information is shared only with persons who have a legitimate need to know. Gossip about clients or their situations is prohibited. Prayer requests are general and does not contain client identifying information.

The center only contacts clients in ways that the client has authorized in writing and shares only the types of information authorized by the client in those ways.

## **CLIENT STORIES**

Clients who have benefitted from the services of Your Choice Pregnancy Resource Center may be invited to share or permit the center to share their stories or related information (including photos or videos of the client and/or minor children). Invitations to share client experiences are unpressured and non-coercive.

Your Choice Pregnancy Resource Center strives to make the sharing experience empowering rather than exploitive for clients by informing clients of how their story and/or images may be used, that receiving continued services from the center is never conditioned on allowing the center to use their story or images of them or their child. A signed form signifying this understanding is obtained prior to use of any client's story and/or images. This form will be maintained in the client's file.

## **DONOR / SUPPORTER INFORMATION**

Non-public information about current, former, or prospective donors and supporters of Your Choice Pregnancy Resource Center, including their identity, is treated as confidential and may not be shared outside of the center or with personnel who do not need access to the information.

## **TRAINING**

All personnel, including volunteers and staff, are trained to comply with these procedures.

## **UNAUTHORIZED DISCLOSURE**

Any unauthorized disclosure or distribution by any means including electronic transmission or copying of confidential information, or that of its employees, volunteers, donors or donees, is prohibited.

## **EXPECTATION TO PROTECT CONFIDENTIAL INFORMATION**

Staff and volunteers of Your Choice Pregnancy Resource Center are expected to keep confidential all information, which they receive in the course of their employment and/or role at the center.

## **RETURN OBLIGATION**

Upon termination of employment and/or volunteering with Your Choice Pregnancy Resource Center, all employees and volunteers will relinquish access and rights to any confidential documents or information.

## **DISCIPLINARY ACTION**

Any staff who discloses confidential information learned from their work for Your Choice Pregnancy Resource Center will be subject to disciplinary action, including possible termination. Unauthorized disclosure by volunteers and board members will subject the volunteer/board member to comparable sanctions.