



Statement of Philosophy

The purpose of this policy is to ensure the confidentiality and protection of personally identifiable information related to children, families, and staff served by or employed with Kids Central, Inc., in compliance with all applicable federal and state laws. Kids Central, Inc. is committed to respecting and safeguarding the dignity, privacy, and rights of children, families, and staff. Confidential information shall be collected, maintained, used, and disclosed only as permitted by law, Head Start program requirements, or organizational policies.

Definitions:

- **Personally Identifiable Information (PII):** Kids Central, Inc. is committed to protecting the privacy and confidentiality of children, families, and staff. In accordance with the Office of Head Start (OHS) guidelines and applicable federal laws, Kids Central, Inc. defines **Personally Identifiable Information (PII)** as any information that directly or indirectly identifies an individual. This includes, but is not limited to, *names, addresses, phone numbers, dates of birth, Social Security numbers, photographs or recordings, child and family records, health, mental health and disability information, family income data, case notes, classroom or program placement, and any combination of data that could reasonably be used to identify a child, parent, or staff member.* All PII, whether maintained in paper, electronic, or verbal form, will be accessed only by authorized personnel and protected from unauthorized disclosure in accordance with Kids Central, Inc. policy and procedures.
- **Record:** A **record** is defined as any information that is directly related to a child or staff member and is maintained by Head Start or by a party acting for the program, regardless of the format in which the information is kept.

POLICY STATEMENT

It is the policy of Kids Central, Inc. that confidential information concerning children, families, and staff shall be protected at all times. Information shall not be disclosed internally or externally except to individuals who are authorized and have a legitimate “need to know” in order to perform their job duties or as required by law.

This policy applies to all staff, consultants, contractors, volunteers, interns, Policy Council



members, and governing body members.

GUIDELINES FOR MAINTAINING CONFIDENTIALITY

1. Record Security

All child, family and staff records, whether paper or electronic, shall be secured at all times.

Paper records must be stored in locked filing cabinets or rooms when not in use. Electronic records must be password-protected and accessible only to authorized personnel. A record can exist in any format including but not limited to, paper files, text messages, electronic files, audio recordings, photographs and videos.

2. Access to Records

Access to child, family and staff records is limited to staff whose job responsibilities require such access. Access to employee records shall be limited to Human Resources and members of the Senior Management team, except as required by law or for Head Start governance, oversight, monitoring, or audit purposes.

3. Documentation of Record Access

Each child's paper file shall include a record access log. Staff must sign and date the log prior to reviewing any file.

4. Use and Disclosure of Information

Confidential information shall be shared only on a need-to-know basis and solely for program purposes.

5. Parent and Guardian Rights

Parents and legal guardians may review records pertaining only to their own child.

6. Professional Conduct

Staff shall not speak about children, families or other staff members in a derogatory, disrespectful, or inappropriate manner in the presence of enrolled children.

7. Health and Safety Information



Health and safety information shall be handled discreetly and shared only with authorized personnel.

8. Electronic Communication

Confidential information shall not be shared through unsecured electronic means.

9. Mandatory Reporting

Confidentiality does not override mandatory reporting requirements.

10. Training and Acknowledgment

All individuals shall receive confidentiality training and sign an acknowledgment form.

Supervisor's Responsibilities:

- Supervisors are responsible for encouraging staff to reread this policy whenever they have a question or need clarification of the policy.
- Supervisors must ensure staff comply with the Confidentiality Policy and promptly address any breaches or concerns.

Professional Development:

- The Human Resources Specialist will train all new hires during their orientation.
- The Human Resources Specialist will obtain signatures of acknowledgement during orientation at the time of hire.
- The Human Resources Specialist will send policy using HR software for all staff to download and sign annually.

Conduct and Violations:

- Violations will result in disciplinary action up to and including termination.



Confidentiality Agreement & Acknowledgment

I acknowledge that I have received, read, and understand the Kids Central, Inc. Confidentiality Policy. I agree to comply with all confidentiality requirements during and after my employment or service. This acknowledgment may be collected and maintained by Human Resources through an electronic tracking system.

Printed Name: _____

Signature: _____

Position/Role: _____

Program/Site: _____

Date: _____