



CONFIDENTIALITY POLICY

Approved by: the Board of the organization

Date: April 17, 2015

Brief definition: Confidentiality refers to safeguarding personal information. Confidentiality means that personal information about the client/patient is kept only between a client and a service provider and is not shared with the third parties (exclusions are discussed in the document below). Unlike confidentiality, if there is anonymity in question, neither staff nor researcher is able to connect existing data with identified particular person to whom these data refers.

One of the basic values of “Center for Information and Counseling on Reproductive Health – Tanadgoma” is inviolability of personal data as well as data obtained during professional activities of organization’s clients, personnel and volunteers.

Information about organization’s clients, personnel and volunteers, as well as use of this information is strictly confidential and shall abide policies of the organization. Making this information public is allowed only in the cases defined by Georgian legislation. Every staff member and volunteer, who has access to clients’ data, shall be given strict instructions about protection of this information.

Organization’s administration shall inform staff and volunteers about confidentiality policy and sanctions that will come into force for policy violation (see below).

Making confidential information public is a gross violation of policy and can become a reason for reprimand, dismissal and/or expulsion from the organization.

Providing client’s personal, health-related or other information to other organizations or colleagues/specialists is allowed only with written permission from the client, received in advance. Before asking for the written permission, service provider shall make sure that the client is in safe, non-violent circumstances and realizes consequences of his/her decision. The client shall be provided with the following information:

- Description of all situations which require data sharing without prior notification or consent of the client (e.g., immediate peril for a client’s life);
- Type of the data that might be shared with other organization or individual;
- Purpose and necessity of sharing or requesting of certain data;
- Validity period of the client’s consent (is defined individually, depends on the purpose of data sharing).



Note: *If the organization receives inquiries from law enforcement or judicial authorities, a manager shall consult a professional lawyer on the issue of providing client-related information to these bodies.*

Collecting and storing information about the client

During service provision the working space shall be organized in a way that communication with a client is conducted in isolation (confidentially), without presence of the third parties or personnel of the organization. Exclusions from this provision are cases when other person's presence is required by the interests of the client, such as presence of some particular specialist. But this shall always happen with prior agreement from the client. Also, another exclusion from this provision is a case when client him/herself asks for a presence of a desired staff member of the organization or some other person (accompanying friend, partner, etc). Discussing any client's case with the colleagues or with representatives of another organization shall be conducted in a way that identifying particular client is not possible.

Client's personal information is strictly confidential. This information shall remain confidential during working with the client and after it's completion. Providing this information is allowed only in the cases stipulated by the laws and/or with written consent of the client.

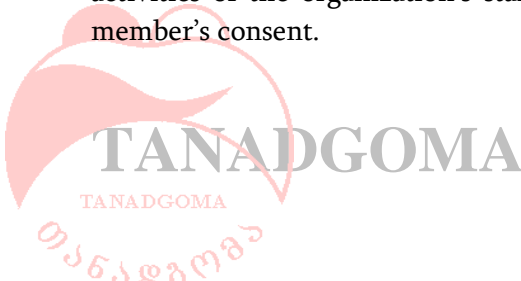
It is necessary to ensure that unauthorized persons do not listen to confidential information and do not have access to the documents with confidential information. Documents containing confidential and sensitive information shall be kept in a safe place, access to which is closed to the third parties. The organization shall provide for an adequate system of storing and protecting information about the clients; access to this system shall be restricted.

If data about a client are kept on the hard disk, a CD or any other digital data storage, it is necessary to make sure that access to data is protected by a system protection code or a password. The password should be known only by authorized personnel;

Organization's administration and service providing personnel is responsible for protecting information. Staff members and volunteers might have access to the confidential information only based on their activities. It is not advisable to pose questions and require confidential information by the staff whose competences do not require having this information.

Confidentiality of information connected to organization's personnel and activities

Information about personal life and professional activities of the staff is confidential. It is absolutely unacceptable to share information connected with the personal life and professional activities of the organization's staff to other organizations and any third parties without staff member's consent.





Center for Information and Counseling on Reproductive Health

TANADGOMA

21 A. Kurdiani str. 21;
0112 Tbilisi, Georgia;
Tel/Fax (955 32) 2352132;
e-mail: center@tanadgoma.ge
www.tanadgoma.ge

Organization's staff, volunteers as well as member of the association are not allowed to share with other organizations and/or individuals information about organizational activities (such as project proposals, tenders, future plans of the organization, etc), which can inflict financial, material or any other kind of harm to the organization. Sharing financial information to other individuals/organizations shall be agreed the management of the organization (executive director, finance director, program manager, project coordinator).

Sharing confidential information about personnel and organizational activities (without appropriate consent) is a gross violation of Tanadgoma policy and can become a reason for using sanctions, such as reprimand, dismissal and/or expulsion from the organization.

***Note:** Each newly hired staff member, before starting work at Tanadgoma is obliged to make oneself familiar with the confidentiality policy and sign a letter of agreement together with the contract (see below).*





**Agreement letter on
compliance with the confidentiality policy**

I have made myself familiar with the confidentiality policy document of “Center for Informaiton and Counseling on Reproductive Health – Tanadgoma”. I agree with the provision of this document and confirm that I shall comply with its requirements.

In case I learn about confidentiality breach I am obliged to inform organization’s administration.

I realize that in case of violating confidentiality policy I will become subject to disciplinary sanctions and this can be a reason for dismissal and/or expulsion from the organization.

Name, surname _____

Date _____

Signature _____

