

South Central Workforce Development Board (SCWDB)



POLICY: CLIENT CONFIDENTIALITY POLICY

EFFECTIVE DATE: JULY 1, 2016

POLICY NUMBER: 2016-02

SUBJECT: CLIENT CONFIDENTIALITY POLICY

PURPOSE:

The South Central Workforce Development Board (WDB) is committed to ensuring client confidentiality and appropriate handling of sensitive information and data obtained from customers.

EFFECTIVE DATE: July 1, 2016

BACKGROUND:

Workforce Development Boards funded under WIOA must implement confidentiality policies and procedures as stipulated in WIOA law, regulations and guidance; Office of Management and Budget (OMB) Circulars; State regulations; and State WIOA policies. This confidentiality policy is required to ensure that individuals or representatives of WDB involved in any type of interaction with participant information, maintain complete confidentiality of information to which they are privy or that they obtained.

CONFIDENTIALITY POLICY

Respecting the privacy of our clients is a basic value of the WDB. Personal and financial information is confidential and should not be disclosed or discussed with anyone without permission or authorization from the WDB Director. Care shall also be taken to ensure that unauthorized individuals do not overhear any discussion of confidential information and that documents containing confidential information are not left in the open or inadvertently shared.

Employees, contractors, volunteers and board members of the WDB may be exposed to information which is confidential and/or privileged and proprietary in nature. It is the policy of the WDB that such information must be kept confidential both during and after employment or volunteer service. Staff, consultants and volunteers, including board members, are expected to return materials containing privileged or confidential information at the time of separation from employment or expiration of service.

“Confidential” means that an individual is free to talk about the WDB and about the programs, but an individual is not permitted to disclose clients’ names or talk about them in ways that will make their identity known. No information may be released without appropriate authorization.

This is a basic component of client care and business ethics. The WDB expects all of its agents to respect the privacy of clients and to maintain their personal and financial information as confidential. All records dealing with specific clients must be treated as confidential.

Unauthorized disclosure of confidential or privileged information is a serious violation of this policy and will subject the person(s) who made the unauthorized disclosure to appropriate discipline, including removal/dismissal.

Applicable Federal Laws, and WIOA Regulations:

- Public Law 113-128 Section 107(h) - Local Board Conflict of Interest
- Public Law 113-128 Section 121(d) (4) - One-Stop Operators
- 20 CFR 679.410(a) (3) and (c) - Local board must avoid inherent conflict of interest
- 29 CFR 97.36(b)(3) and 29 CFR 95.42 Uniform Administrative Requirements for Procurement

Approved:

7-21-2016
Date of WDB Approval

Signed by:


Ron Sowell, WDB Chairman