

## Confidentiality & Privacy Policy (1.4)

Good Days Adolescent Special Needs Center, LLC – Fort Myers, FL

Good Days Adolescent Special Needs Center (GDC) is committed to safeguarding the confidentiality and privacy of all students, families, and staff. This policy outlines the standards and procedures for maintaining the integrity, security, and confidentiality of personal, medical, and educational information entrusted to the Center.

### Purpose

The purpose of this policy is to establish clear guidelines for the collection, use, storage, and disclosure of confidential information, ensuring compliance with all applicable federal and state laws, including the Health Insurance Portability and Accountability Act (HIPAA) and the Family Educational Rights and Privacy Act (FERPA).

### Scope

This policy applies to all staff members, contractors, volunteers, and administrators of GDC who have access to or manage confidential information regarding students, parents, or employees.

### Definition of Confidential Information

Confidential information includes, but is not limited to:

- Student records, including personal data, academic and therapy reports, and progress notes.
- Medical or psychological information.
- Family contact and financial information.
- Staff employment records or performance information.
- Any data or document marked as 'confidential' or reasonably understood to be private.

### Responsibilities

All staff members are responsible for maintaining the confidentiality of information they access through their role at GDC. Responsibilities include:

- Ensuring private discussions are held in secure, confidential spaces.
- Protecting physical and digital records from unauthorized access.
- Sharing confidential information only with individuals authorized to receive it.
- Reporting any breach or suspected breach of confidentiality to the Director immediately.

### **Release of Information**

Information about a student or family may only be released with the \*\*written consent\*\* of the parent or guardian, except in cases where disclosure is required by law. Examples include mandatory reporting of suspected abuse or neglect, compliance with a court order, or sharing information with authorized regulatory bodies.

### **Data Security**

GDC maintains administrative, technical, and physical safeguards to protect confidential information. These include:

- Password-protected databases and encrypted communications.
- Secure storage of paper records in locked cabinets.
- Controlled access to electronic systems based on job responsibilities.
- Regular training on data security and privacy procedures.

### **Breach of Confidentiality**

Any unauthorized disclosure or misuse of confidential information is considered a serious violation of GDC policy. Such breaches may result in disciplinary action up to and including termination of employment or volunteer status, and may be reported to the appropriate legal authorities.

### **Training and Acknowledgment**

All staff, contractors, and volunteers will receive training on confidentiality and privacy practices upon hire and annually thereafter. Each individual must sign a Confidentiality Agreement acknowledging their understanding and commitment to this policy.

### **Review and Oversight**

The Director is responsible for enforcing this policy and ensuring that all procedures align with current laws and best practices. This policy shall be reviewed annually or as needed to reflect changes in privacy regulations or organizational procedures.

Approved: December 2025

Next Review: December 2026