

**Title:** **Participant Confidentiality**  
**Date of Current Version:** **April 2019**  
**Replaces Version:** **April 2012**

## **Background**

The Participant Confidentiality policy describes the steps taken by The Center to maintain participant confidentiality within the parameters of the law.

## **Participant Confidentiality**

1. Participant information may be collected during membership sale, registration for programs or services, in conjunction with surveys, as well as from donations or payments.
2. Senior Center records and other personally identifiable information are confidential in nature. No individual except authorized Center staff, work-study employees, and student interns, shall have access to Center records without the individual's consent, except as listed below.
  - a. As a division within the City of Iowa City, the Senior is subject to the Code of Iowa, Chapter 22, Examination of Public Records (Open Records). Many Center records are subject to disclosure pursuant to a request from the public under Chapter 22 of the Code of Iowa. Under City Council resolution, The Center Coordinator is the custodian of the records at The Center. Center staff will seek counsel from the City Attorney's office when needed and will respond to the request according to advice of counsel.
  - b. Center records may be subject to disclosure to officials pursuant to process, subpoena, or court order authorized pursuant to federal, state, or local law relating to civil, criminal, administrative, or legislative investigative power. Center staff will seek counsel from the City Attorney's office in the event of such request for release of Center records, and will respond to the request according to advice of counsel.
  - c. Volunteers, independent contractors, or program partners who offer programs or provide services at the Center may be given access to personal contact information to conduct routine business (e.g. sharing a class list to communicate with participants regarding the class).
  - d. Participant information may be shared with other City staff members for routine business. (e.g. Parking department for permit information or Revenue department for financial issues such as an insufficient funds check).
  - e. Limited participant information may be accessible to third party vendors for the purpose of conducting routine business on behalf of The Center (e.g. printing, mailing, database support).
  - f. Donors' names may be printed in publications or online, unless the donor requests to remain anonymous.
  - g. Illegal activity is not protected. The Center may review information when a violation of law or Center policy designated to protect facilities, network, and equipment is suspected.
  - h. Persons attending Center programs or public meetings may be recorded or photographed as an audience member. These images may be used for Center or Friends of The Center

programming or promotion, including use in printed materials, online publications and websites, television, and other media.

- i. Security cameras are installed in the Center to protect the safety and security of people, the building, and its contents. Only authorized City staff may view recordings. Center security camera recordings are public records and may be viewed upon receipt of an open records or law enforcement request. Center security camera recordings will be shared with law enforcement as part of investigating and prosecuting crimes committed.
3. Center staff, work-study employees, student interns, volunteers, and independent contractors shall respect the confidentiality of participant information in conversations and actions in and outside of the Center. This includes protecting information from being seen or heard by visitors, members, and participants.
4. Volunteers who are exposed or may be exposed to confidential participant information shall read and discuss the Volunteer Confidentiality Agreement with their supervising staff member, and subsequently sign the agreement prior to beginning their assignment.

#### **Administration**

The Center coordinator or designee is responsible for educating staff and volunteers about the confidentiality policy and implementing corrective measures when the policy is breached. All requests for potentially sensitive information are referred to the coordinator.

Approved by the Senior Center Commission on: April 18, 2019