



Greenhouse Collective Confidentiality Protocol

1. Purpose & Scope

This Confidentiality Protocol outlines the responsibilities of all practitioners, staff, and volunteers at the Greenhouse Collective regarding the protection of confidential client information. It is designed to safeguard personal, sensitive, and health-related information acquired through our mental health, wellness, and community services. The protocol applies to all forms of communication and data storage, whether oral, written, electronic, or otherwise.

2. Definitions

- **Confidential Information:** Any information relating to a client's mental, emotional, or physical health; personal history; contact details; or any information provided during the course of service. This includes information protected under HIPAA or similar state laws.
- **Practitioners:** Licensed therapists, counselors, wellness facilitators, and any other individuals providing services on behalf of the Greenhouse Collective.
- **Sensitive Information:** Any data or details that could be used to personally identify a client or disclose their health status or other personal matters.

3. Confidentiality Obligations

3.1. General Responsibilities

- All practitioners must treat all client information as strictly confidential.
- Confidential information must only be disclosed to those who are authorized (e.g., a client's designated family member with consent, other professionals directly involved in treatment, or as required by law).
- Practitioners must not discuss any confidential details of client cases in public spaces or with unauthorized individuals.

3.2. Secure Handling of Information

- **Record Keeping:** All client records, whether electronic or paper-based, must be stored in secure, locked environments or on password-protected, encrypted systems.
- **Transmission:** When transmitting client information electronically (via email or other communication tools), practitioners must use secure methods (e.g., encrypted email, secure messaging platforms).
- **Access Control:** Access to client records is limited to individuals whose roles require such access. Any shared access must be authorized in advance.

3.3. Communication

- Discussions involving client information should occur in private settings.
- Verbal communications (e.g., phone calls) must be conducted in secure environments where confidential information cannot be overheard by unauthorized individuals.
- Any notes or summaries created during sessions must also be handled as confidential records.



4. Limitations and Exceptions

- **Legal Obligations:** Practitioners may disclose confidential information if required by law, court order, or in response to a subpoena. In such cases, practitioners must inform the Greenhouse Collective's designated compliance officer before making any disclosure.
- **Client Consent:** Confidential information may be shared with third parties if explicit written consent is provided by the client.
- **Emergencies:** If there is an imminent threat to the client or others, a practitioner may disclose confidential information necessary to avert the harm, after documenting the rationale for such disclosure.

5. Record Retention and Destruction

- **Retention:** All client records will be retained for the period required by law or organizational policy, whichever is longer.
- **Destruction:** When records are no longer needed, they must be disposed of in a manner that protects client confidentiality (e.g., shredding paper records or permanently deleting electronic files using approved methods).

6. Breach Notification and Remedial Actions

- **Immediate Action:** In the event of an unauthorized disclosure or suspected breach of confidential information, practitioners must immediately notify their supervisor and the designated compliance officer.
- **Investigation:** A prompt investigation will be initiated to determine the scope of the breach.
- **Notification:** If required by law, affected clients and relevant authorities will be notified in accordance with applicable breach notification requirements.
- **Remediation:** Steps will be taken to remedy the breach and prevent future occurrences, which may include additional training or changes to security practices.

7. Training and Acknowledgment

- **Training:** All practitioners will receive regular training on confidentiality, secure handling of information, and breach response procedures.
- **Acknowledgment:** Practitioners must sign an acknowledgment form confirming that they have read, understood, and agree to comply with this Confidentiality Protocol.

8. Enforcement and Disciplinary Procedures

- **Compliance Monitoring:** The Greenhouse Collective will periodically review compliance with this protocol.
- **Disciplinary Action:** Any practitioner found to be in violation of this protocol may be subject to disciplinary action, up to and including termination of their engagement with the organization, and may face legal consequences if their actions result in harm or legal liability.