Guidelines for Confidentiality January 2004

Protecting the privacy of the individuals who come to the BAC for assistance, and others who are involved in an investigation is a fundamental responsibility of the BAC. Unless waived, confidentiality is automatically granted to all parties with whom the BAC is involved. Our commitment to confidentiality helps gain the trust of individuals interacting with the BAC, and encourages frank and honest exchanges with them.

There may be sensitive issues brought to the attention of the BAC that warrant the involvement or knowledge of other BNL organizations such as Diversity, Legal or Human Resources. In these cases, the BAC will counsel the individual about the need to get others involved by reporting their concern in accord with the existing HR, Diversity or Legal policies.

It is the obligation of each member of the BAC to assure that all information received with respect to a case, including interviews, investigation results and BAC discussions, are kept confidential. All data that are collected, collated, stored, analyzed and distributed in an investigation shall be treated according to the following guidelines:

- Whenever possible, names will be made anonymous by using an alias in all documents, including email and its attachments.
- The BAC will seek consent from the individual to disclose information if it is deemed necessary to further the investigation. Such disclosures will be kept to a minimum.
- We will not discuss the individual's case, including interviews conducted as part of an investigation, where we can be overheard.
- We will never leave records, either on paper or on the computer screen, where other parties can see them.
- Any documents that contain names and are sent through inter-office mail must be in a sealed envelope marked 'private'.
- If we must send data by fax, the sender must ensure that the data cannot be intercepted or seen by anyone other than the intended recipient.
- BAC files, reports and records shall be maintained under conditions of reasonable security and provisions will be made for destruction when appropriate. Documents pertaining to individuals who are litigating against the Laboratory may not be destroyed. The BAC must check with Records Management to get comprehensive info on how long they must be kept.

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- Third parties to whom we disclose personal information must agree to abide by these guidelines.
- The BAC will not maintain confidentiality if a person threatens bodily harm to themselves or others. Safety issues must always be addressed whether or not they involve bodily harm.