

## Confidentiality Policy

Many people associated with the Seattle Cancer Care Alliance come into contact with written, electronic and verbal information that is confidential, private or personal. In the course of your employment (or assignment, or use of hospital facilities), you may come to possess confidential information regarding patients, families, employees, or business information; you understand such information must be maintained in the strictest confidence and used only in the performance of your appropriate and approved duties. This information must be reviewed and/or discussed privately in the appropriate business setting on a need-to-know basis. You must use discretion to ensure that others cannot overhear such conversations or see confidential documents unrelated to their job duties.

Your access to information may be monitored to assure appropriate access, compliance with policy and system integrity. You may not allow unauthorized individuals access to an area or computers where confidential information is produced or stored.

You are responsible for the security of your User ID (log in) and password for all applications to which you are granted access, including those from FHCRC, UW, and Seattle Children's Hospital. You must maintain security of all accounts, passwords and other information; unattended documents or workstations must be secured. You may not share your passwords with others.

You understand that data collected, analyzed and entered into the databases of SCCA, FHCRC, UW and/or Seattle Children's are the property of that institution. You must use that data only in the performance of your duties and must maintain its integrity and confidentiality. For those providing software or services to the SCCA, you agree to maintain in confidence any and all proprietary information or confidential information regarding software or information systems.

SCCA's confidential information includes, without limitation, information relating to SCCA's trade secrets, research and development, inventions, know-how, software (including source code and object code), procedures, purchasing, accounting, marketing, patients, customers, suppliers, financial status or employees ("Confidential Information"). Specific examples of Confidential Information include the following:

1. Patient Care and Research Participant Information is strictly confidential. Its use and disclosure are strictly regulated by SCCA, FHCRC, UW & Seattle Children's policies and by federal and state law including the Washington Health Care Information Act (RCW Chapter 70.02). It may also be subject to contractual restrictions. Any faculty, physician, staff volunteer, contractual party or any other individual requiring access to data considered confidential must obtain that information only through procedures appropriate to the nature of the information and as permitted by applicable law, agreements and policies.

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2. Payroll, Salary and Personnel Data related to any SCCA employee or personnel is strictly confidential. SCCA employees are prohibited from discussing or gaining access to this information concerning other SCCA employees or personnel without appropriate approval, except in connection with their normal job functions and only to the extent necessary for the performance of such job functions. SCCA employees must maintain strict confidentiality with respect to all personnel records and confidential discussions including, but not limited to, salaries, benefits, performance appraisals, counseling and discipline matters.
3. Electronic Information is confidential. Access is granted to applications based on job responsibilities. In areas where there are shared terminals, staff may gather only patient information and research data that they need to know to perform their duties. Your use of electronic information may be monitored.
4. SCCA Business Information not generally known to the public or its competitors is considered to be confidential. Information regarding the financial condition of the SCCA and other information concerning financial and administrative operations is strictly confidential and may only be discussed by employees in connection with their normal job functions, and only to the extent necessary for the performance of such job functions. This information is not to be divulged in whole or in part to anyone outside the SCCA without written permission from the Chief Financial Officer (CFO) or Chief Operating Officer of the SCCA. Unauthorized dissemination of such confidential information is strictly prohibited.
5. Mail or correspondence that has been labeled “confidential”, “personal” or “private” must be opened only by the addressee, unless he or she leaves specific instructions regarding treatment of such mail. All information such as personal profiles, medical reports, company operations, and financial matters should be labeled “confidential”, “personal” or “private”.

It is the responsibility of all faculty, physicians, staff, volunteers and contractual parties to dispose of any Confidential Information, original or reproduced, according to the designated procedures of the SCCA. These procedures include contracted confidential document disposal or shredding. It is also the responsibility of all faculty, physicians, staff, volunteer and contractual parties to safeguard and return to SCCA when their work for SCCA ends, or sooner if SCCA requests, all documents and property in their care, custody or control relating to their work for SCCA or SCCA’s business, including without limitation any documents that contain SCCA’s confidential information.

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It is SCCA's policy not to improperly obtain or use confidential, proprietary or trade secret information that belongs to third parties, including others who have employed or engaged SCCA faculty, physicians, staff, volunteers or contractual parties or who have entrusted confidential information to them. SCCA's faculty, physicians, staff volunteers and contractual parties may not use for SCCA's benefit or disclose to SCCA confidential, proprietary or trade secret information that belongs to others, unless SCCA is advised that the information belongs to a third party and both SCCA and the owners of the information consent to the disclosure and use.

***Unauthorized use or disclosure of Confidential Information may result in disciplinary action, up to and including discharge from employment, termination of contractual arrangements and/or loss of medical privileges. In addition, the unauthorized disclosure of confidential medical information may be subject to civil actions for damages.***

Any question concerning the application of this Policy or the use or disclosure of confidential information should be directed to your supervisor and then to the Corporate Integrity Officer. It is important you discuss any concerns you may have about this policy with your supervisor before signing this document.

### **INDIVIDUAL ACKNOWLEDGMENT**

My signature below signifies that I have read and understand the SCCA's Confidentiality Policy. I agree to adhere to the policy and understand the consequences of violating the policy.

Date: \_\_\_\_\_

Employee Signature: \_\_\_\_\_

Printed Employee Name: \_\_\_\_\_

<u>AFFILIATION -</u>	Please check one:			
<input type="checkbox"/>				
SCCA	FHCRC	Seattle Children's	UW	Other