

GUIDELINES TO PROTECT CLIENT PRIVACY

Client Confidentiality Practices

Client privacy is one of the most important considerations for our partner network. Clients coming to food pantries, meal sites, and shelters feel anxious, and many are struggling to keep their food insecurity secret from their children, some family members, their employer, colleagues, or friends. We must do whatever we can to have practices in place to ensure client confidentiality so people feel welcome to ask for and receive the help they need. Below are a few examples of what is and is not acceptable practice for client confidentiality. This isn't meant to be a complete list but to offer some guidance. If you're uncertain whether you should share information, err on the side of caution and compassion for the client and do not share the information.

It is acceptable to...	It is unacceptable to...
report the number of clients you serve, the number of households, demographic information, and other categorical information to your board of directors, congregation members, donors, elected officials, etc.	name specific people and/or families you serve.
present stories to illustrate poverty and hunger with identifying details omitted to a donor, elected officials, volunteers, your board of directors, congregation members, etc.	talk to anyone (family, friends, associates, etc.) or present a story that has specific details that could identify a person or family (where they work, where children go to school, where they live, what they do for employment).
share statistics with other organizations to indicate an increase or decrease in need, emerging demographics, etc.	name specific clients, share information that could identify them, or talk about the specific service they received from your agency, especially to agencies that may serve the same client.
make connections with clients and have conversations as part of an intake or interview process, or help them while they are guests at your program.	make the initial approach toward clients you recognize outside the work of your program unless you have an outside-the-agency relationship with them.

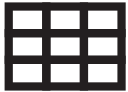
Avoiding Disclosing Personal Data

One of the key guidelines for sharing data is to not individually identify any one person through the data results. By issuing the Client Release of Information, you establish an obligation to not identify individuals personally in any report or findings. Data that could identify an individual, known as **personally identifiable information, or PII**, includes items such as name, date of birth, address, and contact information, including phone number.

Even when you are not sharing someone's PII, the manner in which data are presented may inadvertently disclose who responded.

- For example, if the data results point to a small percentage of respondents with a unique characteristic (e.g., Asian heritage or residing in a group home), the individuals described by the results could still be re-identified.
- As a result, avoid reporting out granular findings that could inadvertently disclose one's identity.

Other guidance for avoiding re-identification of respondents include:



Avoid downloading and sharing spreadsheets with individuals' personal information disclosed. To the extent possible, keep clients' information stored within the encrypted, secure software.



Avoid mapping and sharing individuals' exact addresses. If you are developing maps using client data, don't place pins on their exact address. Instead, develop heat maps or shading of areas where there is a greater concentration of clients residing.



Avoid reporting out data if a question or answer option has limited responses. While the exact number will vary based on your dataset, establish a data suppression rule to not share data if a question or answer has fewer than "X" responses. For example, if fewer than 5 people identify of a certain race/ethnicity, it isn't called out in reports or findings.

That said, there are select circumstances where it is appropriate and necessary to share individual level data. For example, if you are sharing a client's information to another organization to initiate a referral or sharing with the outreach team at the food bank to assess eligibility for SNAP or another program. In these circumstances, ensure that:



The client has agreed to their individual-level data being shared with Central Texas Food Bank network through the Client Release of Information (ROI).



Central Texas Food Bank is requiring all Agency Administrators who are handling the individual-level client data to sign a User Confidentiality Agreement.

Through these administrative safeguards, you can help protect individuals' personal information from being inappropriately disclosed.