

NATHAN & LACEY STEEL

CONFIDENTIALITY POLICY

This policy applies to Nathan & Lacey Steel exclusively and does not represent the views or policies of those they work with including but not limited to FreshStart For All Nations™, Alaska Bible Institute, Church on the Rock – Homer, etc. When working with other ministries, churches, or organizations they will abide by the standing Confidentiality Policy in place. A ‘client’ is any person seeking spiritual input or support for any reason.

Nathan & Lacey Steel are not counselors nor do they promote themselves as a counseling ministry. They only facilitate what only the Holy Spirit can do in an individual’s life. Nathan & Lacey Steel are not professionally trained or licensed counselors therefore should not be considered a substitute for licensed, professional counseling or clinical therapy.

MAINTAINING CLIENT CONFIDENTIALITY

1. We maintain client confidentiality to the fullest extent allowed by law, professional ethics, and church or organizational rules.
2. Confidential client communications include all verbal, written, telephonic, audio or video-taped, or electronic communications arising within the helping relationship. Apart from the exceptions below, Nathan & Lacey Steel shall not disclose confidential client communications without first discussing the intended disclosure and securing written consent from the client or client representative.

DISCUSSING THE LIMITS OF CONFIDENTIALITY AND PRIVILEGE

1. Clients should be informed about both Nathan & Lacey Steel’s commitment to confidentiality and its limits before engaging in counseling.
2. Nathan & Lacey Steel avoid stating or implying that confidentiality is guaranteed or absolute.
3. Nathan & Lacey Steel will discuss the limits of confidentiality and privacy with clients at the outset of meeting.

ASSERTING CONFIDENTIALITY OR PRIVILEGE FOLLOWING DEMANDS FOR DISCLOSURE

1. Protecting confidential communications, including the assertion of privilege in the face of legal or court demands, shall be the first response of Nathan & Lacey Steel to demands or requests for client communications and records.



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DISCLOSURE OF CONFIDENTIAL CLIENT COMMUNICATIONS

1. Nathan & Lacey Steel disclose only that client information they have written permission from the client to disclose or that which is required by legal or ethical mandates.
2. Nathan & Lacey Steel shall maintain confidentiality of client information and shall limit disclosures only to those people having a direct professional interest in the case.
3. In the face of a subpoena, Nathan & Lacey Steel shall neither deny nor immediately comply with disclosure demands, but will assert privilege in order to give the client time to consult with a lawyer to direct disclosures.

PROTECTING PERSONS FROM DEADLY HARM: THE RULE OF MANDATORY DISCLOSURE

1. Nathan & Lacey Steel accept the limits of confidentiality when human life is imperiled or abused.
2. Nathan & Lacey Steel will take appropriate action, including necessary disclosures of confidential information, to protect life in the face of client threats of suicide, homicide, and/or the abuse of children, elders, and dependent persons.

THE DUTY TO PROTECT OTHERS

1. The duty to take protective action is triggered when the counselor:
 - a. Has reasonable suspicion, as stated in your state statute, that a minor child (under 18 years), elder person (65 years and older), or dependent adult (regardless of age) has been harmed by the client; or
 - b. Has direct client admissions of serious and imminent suicidal threats; or
 - c. Has direct client admissions of harmful acts or threatened action that is serious, imminent, and attainable against a clearly identified third person or group of persons.

GUIDELINES TO ETHICAL DISCLOSURE AND PROTECTIVE ACTION

1. Action to protect life, whether the client or a third-person, shall be that which is reasonably necessary to stop or forestall deadly or harmful action in the present situation.



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2. This could involve hospitalizing the client, intensifying clinical intervention to the degree necessary to reasonably protect against harmful action, consultation and referral with other professionals, or disclosure of harm or threats to law enforcement, protective services, identifiable third-persons, and/or family members able to help with protective action.

SPECIAL GUIDELINES WHEN VIOLENCE IS THREATENED AGAINST OTHERS

1. Action to protect third-persons from client violence may require disclosure of imminent harm to the intended victim, to their family or close friends, and to law enforcement.
2. When child abuse or elder abuse or abuse of dependent adults exists, as defined by state law, Nathan & Lacey Steel shall report to child or elder protective services, or to any designated agency established for protective services.
3. Nathan & Lacey Steel shall also attempt to defuse the situation and/or take preventive action by whatever means are available and appropriate.
4. When clients threaten serious and imminent homicide or violence against an identifiable third-person, Nathan & Lacey Steel shall inform appropriate law enforcement, and/or medical-crisis personnel, and the at-risk person or close family member of the threat, except when precluded by compelling circumstances or by state law.
5. When the client threat is serious but not imminent, Nathan & Lacey Steel shall take preventive clinical action that seeks to forestall any further escalation of threat toward violent behavior.

DISCLOSURES FOR SUPERVISION, CONSULTATION, PREACHING, AND PUBLICATION

1. Nathan & Lacey Steel do not disclose confidential client communications in any teaching, preaching, publishing, or other activity without written or other legal authorization by the client.
2. Nathan & Lacey Steel may seek supervision or consultation from each other or another party but not without clients consent.
3. Nathan & Lacey Steel will adequately disguise client identifiers by various means when presenting cases in group or in public forums.
4. Nathan & Lacey Steel will not presume that disguise alone is sufficient client protection, but will consider seeking client authorization when client identity is hard to conceal.



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MAINTAINING PRIVACY AND PRESERVING WRITTEN RECORDS

1. Nathan & Lacey Steel will preserve, store, and transfer written records of client communications in a way that protects client confidentiality and privacy rights.
2. This requires, at minimum, keeping records and files in locked storage with access given only to those persons with a direct professional interest in the materials.

MAINTAINING PRIVACY IN ELECTRONIC DATABASES

1. Nathan & Lacey Steel take special precautions to protect client privacy rights with records stored and transferred by electronic means.
2. This requires, at minimum, use of password entry into all electronic client files and/or coded files that do not use client names or easy identifiers.
3. Client information transferred electronically—FAX, E-mail, or other computerized network transfer— shall be done only after Nathan or Lacey Steel determines that the process of transmission and reception of data is reasonably protected from interception and unauthorized disclosures.

ADVOCACY FOR PRIVACY RIGHTS AGAINST INTRUSIVE POWERS

1. Nathan & Lacey Steel hear the most private and sensitive details of client lives — information that must be zealously guarded from public disclosure.
2. Rapidly expanding and interlocking electronic information networks are increasingly threatening client privacy rights.
3. Though federal and state laws exist to protect client privacy, these laws are weak, are routinely violated at many levels, and the record of privacy right enforcement is dismal.
4. Accordingly, Nathan & Lacey Steel are called to wisely protect and assertively advocate for privacy protection on behalf of our clients against the pervasive intrusion of personal, corporate, governmental, even religious powers.

