

**Policy Title: Dual Relationships**

<p><b>Policy Owner:</b> Director of PTT <b>Policy Originated by:</b> PTT</p>	<p><b>Date Written:</b> 10/1/13</p>
<p><b>Applicable Programs:</b> All</p>	<p><b>Date Reviewed and Approved by PLT:</b> 04/21/15, 05/26/15, 09/21/16, 2/26/2020, 7/14/2021, 7/12/23</p>
<p><b>Statutory or Regulatory Citation:</b></p>	<p><b>Signature if needed:</b></p>

**Policy:** It is the policy of St. David's Center that program participants may apply for, and be selected for an employment position, at St. David's Center. Likewise, St. David's Center employees or employee family members may be participants in St. David's Center programs. These situations create a dual relationship for an employee who is also a program participant or a program participant who becomes an employee. This set of guidelines will apply to situations where a dual relationship exists, so as to create clear expectations regarding the relationship and appropriate boundaries. St. David's Center is committed to protect the data privacy of all program participants, regardless of employment status with St. David's Center and of all employees, regardless of program participant status. There are special considerations and permissions for mental health services as described in the procedures below.

**Definitions:**

**"Participant"** within a St. David's Center program refers to the participant and/or the participant's responsible party.

**Procedure:**

**1. Data privacy laws**

Data privacy laws apply to both employment and program participant information. Employees who also participate in St. David's Center programs are prohibited from using or disclosing any private information they learn as an employee. Program participants who are employees of St. David's Center are prohibited from using or disclosing any private information they learn as a program participant with other employees or anyone else outside of that program.

**2. Separation of roles**

Employees who are also program participants must keep employee responsibilities separate from program participant responsibilities and/or status. In addition, fellow employees of the program in which they participate shall not ask the employee participant to represent the program for which they work.

### **3. Employee access to Mental Health Services at St. David's Center**

An employee who is interested in accessing St. David's Center Mental Health services, may do so under the following conditions:

- a. If the employee/client is not a supervisor of the therapist/provider nor in the chain of command of that supervisor
- b. If the employee /client is not a member of that specific program team
- c. If the mental health therapist/provider assigned to the employee/employee's child is not a personal friend or close colleague
- d. If the mental health therapist/provider believes and signs an acknowledgement that there is enough personal distance from the employee and that they can maintain professional boundaries as well as clinical objectivity, competence, and effectiveness

### **4. Employees who may become the treating clinician of the employee / client**

Employees that may become the treating clinician, shall consider and discuss with supervisor the following factors before entering into the dual relationship:

- a. Do I have a co-habitation, familial or other personal involvement with the client / employee?
- b. Is this client / employee a personal friend, close colleague or supervisor (or in the chain of command above me)?
- c. Do I share clients with this client / employee or does my work require me to interact with them professionally on a regular basis?
- d. Can I maintain professional boundaries as well as clinical objectivity, competence and effectiveness?

### **5. Acknowledgement and Consents**

- a. The employee/ client must sign a consent acknowledging understanding of clarity of roles and review it with their supervisor
- b. Upon getting a referral to the program for a/an employee/client into the mental health program, the clinician that would be providing services shall complete the acknowledgement and consent form and review their supervisor
- c. The above-mentioned consent documents (bullets a. and b.) will become part of the client record and should be routed to the Medical Records department.

### **Violation of this Policy or Procedure**

No or only partial adherence to this policy or procedure may result in noncompliance with current regulatory requirements and subsequent penalties to St. David's Center. Remediation for

violators will include, but not be limited to, disciplinary action up to and including termination depending on the circumstances of the situation at the time.

**Reference or Attachment:**

[Therapist Acknowledgement & Consent](#)

[Employee/Client Acknowledgement & Consent](#)