

# Confidentiality Policy

## 1 - Purpose

This Policy is intended to safeguard confidentiality regarding the affairs of United Way Greater Toronto (UWGT).

This Policy is related to UWGT's Privacy Policy which establishes the policies around how UWGT collects, protects, uses, and disposes of personal information in the conduct of its business. The Privacy Policy requires that each individual who has access to personal information under the custody of UWGT maintains the privacy and confidentiality of such information in accordance with applicable law.

Privacy and confidentiality of personal information, and confidentiality of privileged or proprietary information are fundamental to the operation of UWGT and must be protected at all times in accordance with applicable law.

## 2 - Scope

This Policy applies to those activities engaged in by all Board Trustees, other volunteers, sponsored employees, and all employees. The conditions of this Policy remain in effect even after individuals are no longer associated with or employed by UWGT.

Confidential information includes information that is privileged and proprietary in nature, as well as personal information about identifiable individuals. It does not include information that is published or in the public domain, or that is not personal information as defined by applicable law.

## 3 - Policy

All Board Trustees, other volunteers, sponsored employees, and all employees of UWGT shall hold in strict confidence any confidential information relating to UWGT and its donors, agencies, community partners, constituent organizations, employees, or volunteers that may be obtained in the performance of their duties. The disclosure of confidential information should not be done except in the context of a need-to-know in order for the individuals to properly fulfill their responsibilities.

Confidential information relating to UWGT, its agencies, community partners, and constituent organizations shall not be released to any individual or organization outside of UWGT without prior management approval. When in doubt as to the confidentiality of certain information, no disclosure should occur without first establishing that such disclosure has been authorized by the appropriate UWGT personnel.

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Personal information belonging to individual donors, employees or volunteers shall be respected and protected at all times in the performance of UWGT duties.

- Personal information must be kept in the strictest confidence and not be discussed, accessed, or displayed in the presence of unauthorized individuals. Employees and volunteers must exercise good judgment and care at all times to avoid unauthorized or improper disclosure of confidential information and be aware of risks of inadvertent exposure when in public places.
- Personal information must be collected or used only for defined UWGT purposes.
- Personal information must not be disclosed to any other individual or organization without the consent of the individual, and where consented to, only to those persons who are authorized to receive such information.
- Volunteers who receive custody of confidential information as part of their volunteer responsibility shall not take unauthorized copies or relate the information to any other individual or organization unless explicitly requested by UWGT employees. Information will not be retained after the volunteer task is completed and will be returned or securely disposed of as directed.
- Employees will follow established procedures that have been developed to limit collection, use and disclosure of personal information, and to protect and safely dispose of data so that UWGT's Privacy Policy [*provide link once approved*] is honoured. Employees will ensure that all volunteers are given clear directions on procedures they should follow, and all volunteers shall follow directions diligently.

Any employee or volunteer who is working remotely must also take all appropriate steps to ensure that all confidential information and personal information is appropriately safeguarded and is not inadvertently disclosed to or viewed by other individuals in the household, including ensuring that such information is securely stored, or password protected to protect against unauthorized access or disclosure.

Any vendor or supplier of services to UWGT who requires access to personal or confidential information must sign a [Non-Disclosure Agreement](#) with UWGT or include non-disclosure language approved by the department's Vice President in any agreement. The terms of the Non-Disclosure Agreement shall ensure that the Vendor and its employees handle personal or confidential information provided by UWGT in compliance with UWGT's policies and all applicable laws.

## 4 - Procedures

It is the responsibility of:

- the Chair of the Board to ensure that Board Trustees understand and comply with this Code and related policies; and

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- the President & Chief Executive Officer (CEO) to ensure that employees and other volunteers understand and comply with this Code and related policies.

Any misuse of or improper disclosure of confidential information by an employee in violation of this Policy may result in disciplinary action up to and including termination of employment. In addition, UWGT will also take appropriate action in relation to any volunteer or individual covered by this Policy who misuses or improperly discloses confidential information in violation of this Policy.

**REVIEW PROCESS**