

Policy Type:	Human Resources	Creation Date:	July 2019
Policy #229		Page 1 of	
		Approval Date: (Most recent)	September 2023
Policy Title:	Confidentiality Policy		FINAL

1.0 Overview and Scope

Individual policies with specific parameters exist and are referenced at the bottom of the document. The Confidentiality Policy reflects the general expectations of all employees, contractors, and volunteers. The Confidentiality Policy will be signed by each employee, board member, contractor, student, and volunteer at the commencement of the relationship with the Central Alberta FASD Network.

2.0 Purpose

It is the policy of Central Alberta FASD Network that each employee, board member, contractor, student, and volunteer of Central Alberta FASD Network will not disclose confidential information belonging to, or obtained through their affiliation with, Central Alberta FASD Network to any person, including their relatives, friends, and business and professional associates, unless Central Alberta FASD Network has authorized disclosure. This policy is not intended to prevent disclosure where disclosure is required by law.

3.0 Policy

Confidentiality is the preservation of privileged information. Each employee, board member, contractor, student, and volunteer are cautioned to demonstrate professionalism, good judgment, and care at all times in handling any information related to Central Alberta FASD Network to avoid unauthorized or improper disclosures of confidential information. Each employee, board member, contractor, student, and volunteer are expected and encouraged to discuss the organization with one another and targeted publics, they shall not report opinions expressed in meetings, nor shall they report independently on committee action, or engage in any communication that has not been approved by the Executive Director or that would not be supported by board policy, procedures, or decisions. At the end of the each employee, board member, contractor, student, and volunteer term or upon his/her retirement, resignation or removal they shall return, at the Central Alberta FASD Network's request, all documents, papers, and other materials, regardless of medium, which may contain or be derived from confidential information, in their possession. It is expected that each employee, board member, contractor, student, and volunteer, will not use client lists, donor lists, or other confidential information acquired by virtue of being in the employment, on the board, or in any other relationship capacity, even after they complete their service with the Central Alberta FASD Network.

4.0 Procedures

Policy elements

Common examples of confidential information are:

- Unpublished financial information.
- Data of Clients/Donors/Contractors/Vendors/Other Stakeholders.
- Patents or Copyright protected information.
- Client and Donor lists (existing and prospective).
- Data entrusted to our organization by external parties.
- Marketing and other undisclosed strategies.
- Documents and processes explicitly marked as confidential.

What is prohibited:

- Use of confidential information for any personal benefit or profit.
- Use of confidential information to defame or otherwise harm an individual.
- Disclose confidential information to anyone outside of our organization.
- Replicate confidential documents and files and store them on insecure devices.

Confidentiality Measures:

Refer to the policies listed as Related Policies below:

- Store and lock paper documents.
- Encrypt electronic information and safeguard databases.
- Employees sign contracts that include a non-compete and/or non-disclosure agreements (NDAs) prior to the first day of employment.
- Board members sign Code of Conduct agreements that include the Confidentiality Agreement clause.
- The Executive Director has the sole authority to authorize employees, contractors, volunteers, and students, to access certain confidential information.

Exceptions

Confidential information may occasionally have to be disclosed for legitimate reasons.

Examples are:

- If a regulatory body requests as part of an investigation or audit.
- If our company examines a venture or partnership that requires disclosing some information (within legal boundaries).

5.0 Related Standards, Policies and Processes

110 Board Code of Conduct

- 200 Employee Code of Conduct**
- 203 Clean Desk Policy**
- 211 Information Handling and Security Policy**
- 214 Remote Access Policy**
- 215 Social Media Policy**
- 303 Group Photo Consent Policy**
- 310 Records Management Policy**
- 315 Client Record Keeping Policy**
- 316 Limits of Confidentiality and Duty to Report Policy**

6.0 Revision History

Date of Change	Responsible	Summary of Change

7.0 References