

Confidentiality Policy

1 - Purpose

This policy is intended to safeguard confidentiality regarding the affairs of United Way Toronto (UWT).

This policy is related to UWT's Privacy Policy which establishes the policies around how UWT 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 UWT maintains the privacy and confidentiality of such information.

Privacy and confidentiality of personal information, and confidentiality of privileged or proprietary information are fundamental to the operation of UWT and must be protected at all times.

2 - Scope

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

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

3 - Policy

All Board Trustees, other volunteers and staff of UWT shall hold in strict confidence any confidential information relating to UWT, and its donors, agencies, community partners, constituent organizations, staff, or volunteers that may be obtained in the performance of their duties. Sharing 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 UWT, its agencies, community partners, and constituent organizations shall not be released to any individual or organization outside of United Way Toronto 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 UWT personnel.

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

- Personal information must be kept in the strictest confidence and not be discussed, accessed or displayed in the presence of unauthorized individuals. Staff 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 used only for defined UWT 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 United Way staff. Information will not be retained after the volunteer task is completed, and will be returned or disposed of as directed.
- Staff 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 UWT's *Privacy Policy* is honoured. Staff will ensure that all volunteers are given clear directions on procedures they should follow, and all volunteers shall follow directions diligently.

Any vendor or supplier of services to UWT who requires access to personal or confidential information must sign a Non-Disclosure Agreement with UWT. The terms of the Non-Disclosure Agreement shall ensure that the Vendor and its personnel handle personal or confidential information provided by UWT in compliance with UWT's policies.

4 - Procedures

It is the responsibility of:

- the Chair of the Board to ensure that *Board Trustees* understand and comply with this policy;
- the CEO to ensure that *employees and other volunteers* understand and comply with the policy.

Any breach of confidentiality contrary to this policy may result in disciplinary action up to and including termination.

REVIEW PROCESS