

Confidentiality		
1.	Purpose	This Confidentiality Policy defines and describes the management of confidential information for all Volunteers, Staff, Board Members, Sponsors/Donors and Members of Pride Toronto.
2.	Values	We believe that personal information relating to Volunteers, Staff, Directors, Sponsors/Donors and Members is confidential and every safeguard will be taken to ensure information is kept secure.
3.	Scope	This is an Organization wide policy.
4.	Definitions	Confidentiality: has been defined by the International Organization for Standardization (ISO) in ISO-17799 as "ensuring that information is accessible only to those authorized to have access".
5.	Policy Guidelines 5.1 Guidelines 5.2 Types of information 5.3 Consequences for breaching this policy	5.1 Guidelines i. All Pride Toronto Staff, Board Members, and Volunteers shall keep confidential, notwithstanding any requirement of municipal, provincial or federal legislation and shall not, during the continuance of their involvement or any time after the termination thereof, without the express written consent of Pride Toronto, disclose to any person or organization any donor, sponsor, member, financial or business information of the organization which they may have acquired during the course of their involvement with Pride Toronto. ii. All information concerning Pride Toronto Volunteers, Staff, Board Members, Donors and Members including, but not limited to, all computer software and files, Pride Toronto business documents and printouts, and all volunteer, employee, donor and supporter records, will be held in strict confidence and not discussed without explicit written permission of the persons involved notwithstanding any requirement of municipal, provincial or federal legislation. 5.2 Types of information Types of Organizational information that requires confidentiality includes: i. all group meetings and discussions are to be kept confidential by the individuals in attendance with three exceptions: <ul style="list-style-type: none"> • decisions are recorded and made public • the content of the discussions is relayed to the individual to whom the group reports • all individuals involved in the discussions agree that the content of the discussion can be shared with specific individuals or groups Types of individual information that requires confidentiality include, but are not limited to: <ol style="list-style-type: none"> i. medical history; and ii. addiction / substance use history; and iii. criminal history; and iv. immigration status; and v. family circumstances; and vi. contact information such as personal mailing address, email

		<p>address, and telephone numbers; and</p> <p>vii. legal names; and</p> <p>viii. any other private social issues as the individual chooses to designate as confidential</p> <p>5.3 Consequences for breaching this policy</p> <p>An employee or volunteer who is in breach of this policy can be subject to an investigation, at the discretion of the Board or Executive Director. Consequences of breaching this policy may result in one or more of the following actions:</p> <p>i. a verbal or written warning; and/ or</p> <p>ii. dismissal; and / or</p> <p>iii. litigation and / or</p> <p>iv. Or other action as deemed appropriate by the Organization</p>
6.	References	i. Intellectual Property
7.	Appendices	None
8.	Approval & Responsibility	<p>i. This policy shall be reviewed by the Human Resources and Compensation Committee every two years to assess the effectiveness of the policy in achieving the purpose set out in Section 1 as well as comply with municipal, provincial and federal laws and regulations, as may be amended from time to time.</p> <p>ii. Concerns and / or questions about this policy can be directed to the Executive Director.</p> <p>iii. This policy shall be amended only by resolution of the Board of Directors through review and recommendation of the Board Governance Committee.</p>
9.	Approval Dates	<p>This policy was approved on: 11-Feb-13</p> <p>This version takes effect from: 12-Feb-13</p> <p>This policy will be reviewed by: 11-Feb-15</p>

Confidentiality Procedure Draft:

1. The *Policy Checklist Agreement* confirming that the Confidentiality Policy has been read and discussed, will be signed by employees, , volunteers and Board Members as part of the initial hiring or orientation.
2. The signed *Policy Checklist Agreement* will be placed in the employee's file and kept by the Executive Director, or in the volunteer's file and kept by the Volunteer Program Manager, or in the Board Member's file and kept by the Secretary of the Board.
3. Personnel will not have access to any confidential information until after they have signed the *Policy Checklist Agreement*.

When a breach is identified the Executive Director or the direct Manager will appoint an appropriate person to investigate the complaint and to provide a report with recommendations of disciplinary actions.

Volunteer complaints will be directed to the Volunteer Program Manager, Staff complaints will be directed to the Executive Director, and Executive Director or Board Member complaints will be directed to the Board of Director Co-Chairs.