



Privacy/Confidentiality Policy & Procedure			
Document Type	Supplementary	Last Reviewed	June 14, 2022
Date Adopted	May 23, 2003	Approved	June 14, 2022

Reference Document: Record Retention & Disposal Policy (Sup24)

1. Principles

Employment and/or volunteer service (Service) at United Way of Perth-Huron (UWPH) involves access to privileged information that is confidential.

2. Policy

All employees and volunteers at UWPH are required to hold in the strictest confidence, during the term of their Service and at all times thereafter all UWPH, donor, community partner, Supported Partner information (Information) that becomes known to them during the time of their Service at UWPH. This requirement applies, but is not limited to, personal and corporate charitable donations, personnel records and detailed financial information.

From time to time, information about personal and corporate charitable donations and other financial information from UWPH, community partner or Supported Partner may be shared or disclosed, but only as identified in the Procedure section below.

A copy of this Privacy/Confidentiality Policy & Procedure is provided to each UWPH employee and volunteer to demonstrate UWPH's commitment to the privacy and confidentiality of Information. Service at UWPH is conditional upon the employee or volunteer signing the Agreement portion of this agreement and which indicates agreement that the employee or volunteer is bound by the intent and details of this Policy & Procedure.

3. Procedure

To protect Information, employees and volunteers will:

- understand the only authority to permit the release of Information rests with the UWPH Executive Director¹ who will be guided by good judgment, relevant legislation, UWPH policies, procedures and by-laws, and donor or agency permission as required;
- be provided access to confidential information on a 'need-to-know' basis that is aligned with the requirements of the assigned job and when it is needed in the performance of their duties. Access permissions to confidential information will be determined on a case-by-case basis;
- share Information only with authorized individuals;
- share Information with the public as directed by the UWPH Executive Director¹;
- share Information between themselves, but only as required and only in an environment where it cannot be inadvertently overheard by others;

- never provide Information in response to a public request for Information without the authorization of the UWPH Executive Director, or the Board of Directors or Authorized Leadership Team member (per the Business Continuity Plan) in the absence of the Executive Director;
- release approved/authorized Information only on UWPH letterhead; and,
- ensure that all records are created, used, maintained, preserved, and destroyed in accordance with the Record Retention and Disposal Policy (Sup24).

The UWPH Privacy/Confidentiality Policy & Procedure shall not apply to information which:

- is available to the public through UWPH or other sources
- is rightfully received from a third party without restrictions on disclosure or confidentiality
- is approved for release by the Executive Director
- is disclosed pursuant to a requirement of a governmental agency or by judicial requirement

4. Compliance

It is the responsibility of:

- the Board President to ensure that Board Directors understand and comply with this Policy; and,
- the Executive Director 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.

5. Agreement

I agree to comply with, and be bound by, the intent and the details of the United Way of Perth-Huron Privacy/Confidentiality Policy and Procedure and understand the actions United Way can undertake if I fail to fulfill my agreement whether providing Service to United Way or not.

I further understand that my agreement to the intent and details of this Policy and Procedure never expires and my agreement will survive even though I might no longer be providing Service to United Way of Perth-Huron.

Employee/Volunteer	
Name	
Signature	
Date	
Witness	
Name	
Signature	
Date	