



**CLARINGTON EAST FOOD BANK
GOVERNANCE AND ADMINISTRATION
#1.12 Privacy and Confidentiality Policy**

#1.12 Privacy and Confidentiality Policy	
Policy Section: Governance and Administration	Policy Section: #:1
Policy Name: Privacy and Confidentiality Policy	Policy: #1.07
Approved By: Board of Directors	Original Date: Aug. 01, 2023
Revision #: 1st draft	Revision Date:
Review By: Executive Director and Board of Directors	Review Date: reviewed annually
Applies to: Neighbours, Employees, Directors, and Volunteers	# of Pages: 4

1. DEFINITIONS

1. **Personal Information Protection Electronic Document Act:** “PIPEDA” will be used throughout all documentation as the abbreviation for the Personal Information Protection Electronic Document Act.
2. **Information and Privacy Commissioner of Ontario:** “IPC” refers to the privacy laws of the Province of Ontario.
3. **Personal Information:** Information about an identifiable individual such as:
 - a) age, name, ID numbers, income, or ethnic origin.
 - b) opinions, evaluations, comments, social status or disciplinary actions, and
 - c) Employee, Neighbour, or Volunteer files.

2. POLICY

CEFB Privacy and Confidentiality Policy will ensure:

1. Compliance with PIPEDA and IPC when collecting, using, disclosing, and retaining personal information.
2. That personal information shall be used or disclosed for only the identified purposes for which it was collected and only kept as long as it is needed to serve those purposes.
3. Anyone giving private information to CEFB is aware of and consents to the use and storage of their personal information.
4. That we have a publicly posted Privacy Policy.
5. Establish document retention guidelines for all personal information collected.

3. POLICY



**CLARINGTON EAST FOOD BANK
GOVERNANCE AND ADMINISTRATION
#1.12 Privacy and Confidentiality Policy**



The purpose of this policy is to establish the rules of the collection, use, and disclosure of personal information entrusted to CEFB by its neighbours, employees, volunteers, and board members.

4. PROCEDURE

1. Limiting Collection, Use and Disclosure and Retention of Information

- a. The personal information collected shall be limited to that which is necessary for the purposes described above or deemed necessary from time to time to deliver requested products and services.
- b. The CEFB shall take all reasonable steps to ensure that the information provided to it, is not used for the purposes other than those for which the information was obtained.
- c. The CEFB shall retain personal information provided to it, only for so long as it is required for the purposes as stated above. Once personal information is no longer required for the stated purposes, or upon request of an individual constituent, such information shall be disposed of in a secure manner.
- d. Neighbours' personal information is collected on our Application form for the sole purpose of the Hunger Count statistics in Link 2 Feed. Service will NOT be denied if a Neighbour chooses not to disclose data. Neighbours provide Informed Consent on F4.03.01 Neighbour Acknowledgment Form (Appendix A).
- e. All applications for employee, volunteers, Neighbour, and board member will contain a disclosure clause with a tick box beside the disclosure to acknowledge understanding of the collection of personal information.
- f. The CEFB Board Directors, Executive Director and Volunteers are not to use or distribute any personal information.
- g. All personal information will be kept confidential for 7 years after the employee, Neighbour, volunteer, or board member leaves CEFB. After the 7 years, all documents will be shredded.

2. Accuracy and Security

- a. The CEFB shall take all reasonable steps to maintain the accuracy of the personal information retained by using appropriate security safeguards to provide the necessary protection, including:
 - 1) physical measures such as locked filing cabinets, alarm systems, and restricting access to areas in which personal information is stored;
 - 2) technological resources such as firewalls, encryption software, and ensuring passwords are in place;
 - 3) organizational controls including security clearance measures, employee training, the use of confidentiality agreements, and limiting access on a need to know basis.



**CLARINGTON EAST FOOD BANK
GOVERNANCE AND ADMINISTRATION
#1.12 Privacy and Confidentiality Policy**

- b. Any emails sent to our Neighbours, Donors, Volunteers, or Members will be sent in the following manner:
TO: Sender; BLIND COPY (BCC) to the email address group.
- c. If personal information has been shared externally, the Board Chair and Executive Director will complete a Correction Action Report which will include creating a plan to contain the breach, notify those affected and take corrective actions to prevent further breaches and place a formal report in the individual responsible file.
- d. The CEFB, when made aware, will tell anyone misusing CEFB collected personal information to stop, verbally and in writing.

3. Openness

The CEFB shall provide, upon request, information about its policies and practices respecting the management of personal information. The policy is published on the CEFB's website.

4. Access

- a. Upon request to the CEFB Chair, Treasurer or Executive Director any individual shall be informed of the existence and use of their personal information and shall be given access to that requested information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended or deleted as appropriate.
- b. When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. If you require assistance in preparing your request, please contact the CEFB Chair, Treasurer or Executive Director.
- c. If we cannot provide you with access to your personal information, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions.
- d. The sitting CEFB Chair, Treasurer and Executive Director will be the 'keepers' of the personal information at any given time.

5. ROLES AND RESPONSIBILITIES

- 1. CEFB Board of Directors and Executive Director are to inform all Employee, Volunteers, and relevant individuals of its policies and practices for the management of personal information.
- 2. Executive Director or designate are to ensure that all board members, employees, and volunteers have signed F1.12.01 Confidentiality Agreement (Appendix A).



**CLARINGTON EAST FOOD BANK
GOVERNANCE AND ADMINISTRATION
#1.12 Privacy and Confidentiality Policy**

3. Treasurer and Executive Director to securely maintain donors’ information for income tax purposes.
4. Executive Director or designate will ensure that when Neighbours register that they are aware of our #1.12 Privacy and Confidentiality Policy and provide informed consent to their data being collected as indicated on the F4.03.01 Neighbour Acknowledgement (Appendix A).
5. At the fall Volunteer training both the F1.12.01 Confidentiality Agreement (Appendix A) and #1.12 Privacy and Confidentiality Policy will be reviewed by the E.D. or designate.
6. If personal information has been shared externally, and there is a breach, the Board Chair and E.D. will complete a F 1.16.01 Correction Action Report (Appendix A) which will include creating a plan to contain the breach, notify those affected and outline the corrective actions to be taken.
7. If a Breach in Privacy has occurred, at the next Board Meeting the corrective actions will be reported to the Board by either the Board Chair or Executive Director.
8. Executive Director will ensure that the #1.12 Privacy and Confidentiality Policy is posted on our website and in the waiting area of CEFB.
9. At January’s Board Meeting review all our security measures and ensure that they are current to PIPEDA.

6. REFERENCES AND SOURCES

1. Personal Information Protection Electronic Act (PIPEDA)
2. Information & Privacy Commissioner of Ontario (IPC)
3. Volunteer Handbook
4. Human Resources Handbook
5. Board Handbook
6. HR Covered

7. APPENDIX

Document Name
1. F1.12.01Confidentiality Form
2. F4.03.01Neighbour Agreement Form



**CLARINGTON EAST FOOD BANK
GOVERNANCE AND ADMINISTRATION
#1.12 Privacy and Confidentiality Policy**



3. F1.12.02 CEFB Waiver
4. F1.12.03 Employee Information Sheet
5. F1.16.01CAR

8. REVISION CONTROL

Date	Revision Details	Revision #	Effective
		Revision #1	