FAMILY VISIONS INCORPORATED
POLICY AND PROCEDURE MANUAL

POLICY: **CONFIDENTIALITY: BOARD, STAFF, VOLUNTEERS AND OTHERS**	PAGE 1 of 4	**POLICY NO:** GEA-005
	DATE ISSUED: February 16, 2022	PREVIOUS POLICY DATE/NAME: BDA01-60 Privacy/HR03-80 Confidentiality
		RELATED DOCUMENTS: Confidentiality Form
APPROVED BY: Board of Directors	DISTRIBUTION: Board Policy	

This policy addresses and applies to the Family Visions Inc. Board, Staff and any Volunteers who support the Family Visions Inc. organization.

PURPOSE:
The purpose of the Confidentiality Policy is to ensure the privacy of those we serve, our employees, volunteers, donors, and other stakeholders of Family Visions Inc., as well as ensuring the protection of their personal information.

PRINCIPLES:
1. Everyone should have the right to control the collection, use and dissemination of their personal information and all personal information should be used only when necessary
2. Misuse of personal information can have potentially devastating impacts on victims.

DEFINITIONS:
- The Confidentiality Policy defines Family Visions Inc. expectations of how the Board of Directors, Staff and Volunteers will conduct themselves during business and while working with others including those who are vulnerable.
- Personal information includes but may not be limited to: home address and other contact information; any identifying number such as MB health number or social insurance number; financial, banking, or personal credit information; information related to marital status, sexual orientation, health history, religion, and citizenship status.
- PIPEDA: Personal Information Protection and Electronic Documentation Act – federal privacy legislation
- FIPPA: Freedom of Information and Personal Privacy Act – provincial legislation
- PHIA: Personal Health Information Act – provincial legislation

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POLICY:
Family Visions Inc. is committed to protecting the personal privacy of the Board, Staff (employees), donors, customers and our supported individuals.

Anyone who has access to anyone else's personal information is expected to respect the privacy of whoever's information they have access to.

Sharing personal information with anyone outside of Family Visions Inc., or with anyone with Family Visions Inc. who does not need this information as part of their duties, is a breach of this policy and may be a breach of the law.

This policy is intendent to be close adherence to federal and provincial legislation including but not limited to FIPPA, PHIA, and PIPEDA.

PROCEDURE:
All persons associated with Family Visions Inc. shall collect or acquire only as much personal information about an Individual as is reasonably necessary to carry out the Agency's obligations. All persons associated with Family Visions Inc. are responsible for protecting all confidential information that is obtained, handled, learned, heard, or viewed in the course of their association with the agency.

The use and disclosure of confidential information is acceptable only during the express function of the person's professional responsibilities and duties associated with Family Visions Inc. and is based only on a need to know. Discussion regarding confidential information will not take place in the presence of persons not entitled to the information or in public places.

All persons (Board and Staff) associated with Family Visions Inc. shall sign a Confidentiality Pledge at the commencement of their relationship with Family Visions Inc. as a condition of their involvement with the Agency. This pledge shall be kept on file.

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All persons associated with Family Visions Inc. have a duty and an obligation to report, in writing, actual or suspected breaches of confidentiality. An alleged breach of this policy shall be brought to the attention of the Executive Director if regarding a staff member, or the Board Chair if regarding a board member or the Executive Director. If it is in regards to the Board Chair, it shall be brought to the Vice-Chair's attention

Such breaches may result in disciplinary action up to and including termination of employment and/or removal from the board as per the bylaws.

Where the law requires, all breaches will be reported to the proper authorities.

GUIDELINES:
The following are ten principles that Family Visions Inc. must comply with in respect to privacy of personal information.

1. **Accountability:** Family Visions Inc. is responsible for personal information under its control. Family Visions Inc. has designated the Executive Director, as the Privacy Officer who is accountable for the agency's compliance in protecting personal information and to answer questions from individuals about their personal information.

2. **Identifying Purpose:** The purpose for which personal information is collected, used disclosed and retained shall be identified by the agency at or before the time the information is collected. Family Visions Inc. does not collect, use, disclose or retain personal information for any commercial activity.

3. **Consent:** The knowledge and consent of the individuals are required for collection, use, disclosure and retention of personal information except when required by law, i.e. payroll, benefits, RRSP, registered pension plan contributions, organizational incorporation information and membership.

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4. **Limiting Collection:** The collection of personal information shall be limited to the amount and type necessary for the purposes identified by the agency. Information shall be collected by fair and lawful means.

5. **Limiting Use, Disclosure and Retention:** Personal information shall not be used or disclosed for purposes other than those for which it was collected except with the signed consent of the individual or as required by law. Only personal information that is identified on a Release of Personnel Information Waiver App will be disclosed to an organization identified on that same consent form, i.e. banking institution. Personal information shall be retained only as long as necessary for the fulfillment of purpose or as required by law.

6. **Accuracy:** Personal information shall be as accurate, complete and up-to-date as is necessary for the purpose for which it is being used. The onus is on the individual to provide updates of personal information.

7. **Safeguards:** Security safeguards appropriate to the sensitivity of the information shall be in place to protect personal information. All personal information is maintained in a secure location and is accessible only by assigned personnel.

8. **Openness:** Family Visions Inc. shall make policies and procedures related to the management of personal information available to individuals.

9. **Individual Access:** Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information An individual shall be able to challenge accuracy and completeness of the information and have it amended as appropriate. Individual requests must be made in writing to the Executive Director/designate.

10. **Challenging Compliance:** An individual shall be able to address a challenge concerning compliance with the above principles. Complaints must be made in writing to the Executive Director/designate.

11. **Limits of Confidentiality:** If somebody discloses that they are presently a danger to themselves or to others, or discloses past harm to themselves or others – then information must be reported to the appropriate authorities. Rules and policies regarding confidentiality are suspended.