



Document Number:	POL_3104
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## 1.0 Purpose

It is the policy of Rocky Mountain Adaptive Sports Centre (“RMA”) to limit the disclosure of confidential information that could be detrimental to the best interests of RMA, its beneficiaries or clients. The directives as defined within this policy are intended to enhance public confidence in the integrity of RMA and its employees, volunteers, students, and third-party service providers.

## 2.0 Policy Details

### A. Acknowledgment of - Confidentiality

Before or upon assuming their official duties, all individuals will sign 2.5 - Confidentiality certifying they have read and agree to abide by the standards as defined in this policy.

### B. Handling of Confidential Information:

- I. Individuals employed by or engaged with RMA may, through the normal day-to-day provision of services, be entrusted with confidential information. Individuals are responsible for ensuring the privacy of confidential information and for exercising discretion in the handling of such information.
- II. Individuals will not knowingly, or willfully, directly or indirectly, misuse, disclose or disseminate to any third party any confidential information belonging to RMA which the individual acquired in connection with or as a result of their employment or engagement with RMA.
- III. All records containing confidential information created or received by individuals must be protected against unauthorized access, collection, use, disclosure, retention or disposal through the use of reasonable security measures and effective records management.



All clients, employee and volunteer medical information will remain confidential except by written release or where the release is required by law. However, some types of insurance require the delegate, employee or volunteer to release information to insurer(s) in order to validate claims or eligibility.

C. Disclosure of Confidential Information:

Employees, volunteers, students, third party service providers, clients, donors, and suppliers will be made aware that no information beyond that which is included on his or her business card (name, title, business address, email, phone number) will be disclosed unless otherwise requested not to do so, to anyone outside the organization unless specific written authorization is given by the individual, or as required by law. At all times, judgment and discretion must be used when asked to disclose confidential information. Unless required in the fulfillment of duties or with prior authorization, disclosure of confidential information (see definition above) to individuals outside RMA who are not authorized to receive such information, is strictly prohibited unless required by law.

D. Breach of Confidentiality:

All individuals must comply with the following standards. Failure to do so will be considered a breach of confidentiality:

- I. Individuals must not place themselves in a position of obligation to persons who might benefit or appear to benefit from disclosure of confidential information.
- II. Individuals must not benefit or appear to benefit from the use of information not generally available to the public and which was acquired during the course of their official RMA duties.
- III. Individuals must consult with their supervisor when they are requested to provide any information which may breach the confidentiality standards defined in this policy.
- IV. Individuals who receive unsolicited information, misdirected mail, or who have access to confidential information without authorization must notify their supervisor immediately.
- V. Any person working for/engaged with RMA, who for any reason, deliberately accesses or misuses confidential information not required in the performance of their duties is in breach of confidentiality, whether or not the information is disclosed to another person(s).



#### E. Termination of Employment/Engagement/Contract:

At the conclusion of their services, individuals must return all intellectual property, such as documents, papers, computer files and other materials in their possession or control that relates to RMA. Ownership of all documents, computer files and all other electronic or hard-copy material, will remain the property of RMA. Individuals are not permitted to make copies, in part or in whole, manually or electronically, of any confidential or proprietary information belonging to RMA.

The duty to respect the directives as defined within this policy continues after the individual's termination of employment, engagement, or contract with RMA. RMA shall have the right to enforce its lawful rights and seek legal remedies against any offending individual(s) who fail to comply with the directives as defined within the policy following termination of employment, engagement, or contract with RMA.

#### BREACH OF POLICY:

Individuals who fail to comply with this policy during the course of their employment, engagement, or contract with RMA or following the conclusion of their services, will be subject to disciplinary action, up to and including termination of employment, engagement, or contract with RMA, and/or legal action, as applicable.

#### RESPONSIBILITIES:

The Executive Director, Human Resources Committee, in consultation with the Privacy Officer, is responsible for advising stakeholders, maintaining, monitoring, and revising this policy, for authorizing exceptions, and for adhering for the secure retention and destruction of confidential information.

#### INQUIRIES:

All questions regarding this policy or the confidentiality of information must be directed to Human Resources Committee.



### 3.0 Policy Scope

This Policy applies to Rocky Mountain Adaptive Sports Centre (“RMA”). The term “employees” is used to refer collectively to the employees, volunteers, directors and officers of RMA, and consultants, contractors and other persons engaged by RMA to act on its behalf.

The duty to preserve the confidentiality of RMA information extends beyond, and continues after the individual’s termination of employment, engagement, or contract with RMA.

### 4.0 Related Policies

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### 5.0 Policy Owner

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### 6.0 Definitions

Confidential Information refers to information that, if disclosed without authorization, could be prejudicial to the interests of the Society and/or individual(s) in or associated with RMA.

Confidential information includes but is not limited to the following:

- Any document which identifies a client by name.
- Any document which contains personal delegate, employee, or volunteer information

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beyond the name, title, business address, business e-mail and business phone number(s).

- In-camera (limited attendance by senior management and advisors who customarily attend meetings) minutes, or other minutes marked 'Confidential', resulting from Board meetings and/or their committees.
- Incoming and outgoing e-mails, hard-copy mail, and faxed document marked 'Private' or 'Confidential', including copies.
- Documents that contain trade secrets or proprietary information such that the sharing of said documents may assist a competitor(s).
- Any other document marked confidential by the sender. The sender will use discretion to identify what should be designated confidential in addition to the documents listed.

## 7.0 Procedures

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