

Policy:	Policy Manual No.	Authorised By:	Policy Section:	Effective:	Review Date:
Confidentiality	POD - CoP	Governance Motion 9/19/7	People and Organisational Development (POD)	24/09/2019	01/09/2020 (Annually)

## CONFIDENTIALITY POLICY (CoP)

### 1 Purpose:

The purpose of this policy is to explain how we expect Glenfield Community Centre Incorporated (“GCC”, “the Centre”) Governance and Staff to treat confidential information.

GCC Governance and Staff will unavoidably receive and handle personal and private information about clients and our organisation. We want to make sure that this information is well-protected.

We must protect this information for two reasons. It may:

- Be legally binding (e.g. sensitive customer data, employee personnel files.);
- Constitute the backbone of our business, giving us a competitive advantage (e.g. business processes.).

### 2 Scope:

This policy affects all GCC Governance and Staff, contractors and volunteers, who may have access to confidential information.

### 3 Policy:

GCC Governance and Staff must not disclose any information that is confidential to the Centre either during their employment or term of office, or after termination of their employment or term of office. This disclosure includes disclosing confidential information to any other party. All organisational information must only be used for the purpose of work with the Centre.

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## 4 Policy Elements:

Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information;
- Data of Customers/Partners/Vendors;
- Patents, formulas or new technologies;
- Customer lists (existing and prospective);
- Data entrusted to our organisation by external parties;
- Pricing/marketing and other undisclosed strategies;
- Documents and processes explicitly marked as confidential;
- Unpublished goals, forecasts and initiatives marked as confidential.

GCC Governance and Staff may have various levels of authorised access to confidential information.

When GCC Governance and Staff have any organisational information in their possession, they must take reasonable steps to safeguard the confidentiality of this information.

### What GCC Governance and Staff should do:

- Lock or secure confidential information at all times;
- Shred confidential documents when they're no longer needed;
- Make sure they only view confidential information on secure devices;
- Only disclose information to other employees when it's necessary and authorised;
- Keep confidential documents inside the Centre's premises unless it's absolutely necessary to move them.

### What GCC Governance and Staff shouldn't do:

- Use confidential information for any personal benefit or profit;
- Employees will not, at any time, without the Centre's approval, disclose or reveal any information to any other person or party whatsoever;
- Replicate confidential documents and files and store them on insecure devices.

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On termination of employment or term of office, GCC Governance and Staff shall immediately deliver to the Centre:

- All documents in his/her possession or power, including technical manuals, policy documents, and lists of clients and delete them from their personal devices;
- All copies or extracts from such documents in their possession;
- All keys and passes to the Centre or any related party of the Centre in their possession;
- Access passwords and login information for organisation email and websites.

## 5 Confidentiality Measures:

GCC will take measures to ensure that confidential information is well-protected.

We'll:

- Store and lock paper documents;
- Encrypt electronic information and safeguard databases;
- Ask employees to sign non-compete and/or non-disclosure agreements (NDAs) as required;
- Incorporate a statement relating to this policy in all employee contracts;
- Ask for authorisation by senior management to allow employees to access certain confidential information.

## 6 Exceptions:

Confidential information may occasionally have to be disclosed for legitimate reasons.

Examples are:

- If a regulatory body requests it as part of an investigation or audit;

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- If our company examines a venture or partnership that requires disclosing some information (within legal boundaries);
- If an employee requests access to their own personnel file.

## 7 Disciplinary Consequences:

In such cases, GCC Governance and Staff involved should document their disclosure procedure and collect all needed authorisations. GCC is legally bound to avoid disclosing more information than needed.

GCC Governance and Staff who don't respect our confidentiality policy will face disciplinary and, possibly, legal action.

We'll:

- Investigate every breach of this policy;
- Terminate any employee who wilfully or regularly breaches our confidentiality guidelines for personal profit. We may also have to punish any unintentional breach of this policy depending on its frequency and seriousness;
- Terminate employees who repeatedly disregard this policy, even when they do so unintentionally;
- Undertake a Code of Conduct enquiry for any cases involving GCC Governance members.

This policy is binding even after separation of employment or end of term of office.

## 8 Related Legislation:

- Privacy Act 1993

This policy meets or exceeds current statute, bylaws or regulations.

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## 9 Document Management Control:

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