



Policy Section 2: BOARD STRUCTURE AND RESPONSIBILITIES

Policy #: 2.4

Policy: Confidentiality of Information

Revision: Rev 3

Approval: July 07, 2021

1. Purpose:

- 1.1 To detail Director's responsibilities regarding confidential/sensitive information to which they may be privy in the course of their duties.

2. Definitions:

2.1 Confidential Personal Information:

- 2.1.1 information pertaining to any aspect of an individual's health records, medical condition, treatment, prescribed medications, prognosis etc.
- 2.1.2 information contained in an employee, participant or volunteer's personnel file including matters of conduct, job performance, attendance, etc.
- 2.1.3 information pertaining to an individual's financial affairs, home environment, domestic issues, etc.

2.2 Personal Contact Information:

- 2.2.1 a person's home address, telephone number(s), email address, other social media contacts, etc.

2.3 Confidential Business Information:

- 2.3.1 information pertaining to sensitive business activities including pending contracts, property sale or acquisition, personnel matters etc.

2.4 Board Confidentiality:

- 2.4.1 the details of discussion/debate of agenda items during Board meetings and in-camera sessions.

3. Detailed Policy Statement:

- 3.1 Directors owe a duty of confidentiality to the Board and to The Flower Cart. Directors will not disclose information of a confidential nature to which they are privy by virtue of their position, except as required by law, while they are Directors of the Board or after their service has been completed.

4. Implementation:

- 4.1 Directors will not divulge, by any means, the confidential personal information of a Flower Cart employee, participant, volunteer, or Director to another individual or group unless required to do so by law.
- 4.2 Directors will not provide the personal contact information of another Director, Flower Cart employee, participant, or volunteer, to a third-party unless they have permission of that person to do so.
- 4.3 Directors will not disclose to unauthorized persons or groups The Flower Cart's business information of a sensitive nature that may give unfair advantage to an outside party, compromise an on-going negotiation, or place The Flower Cart in a disadvantageous position.
- 4.4 Materials, files, reports, and other items used to support briefings, presentations, performance assessments, etc. and contain confidential information are to be handled and stored with due care.
- 4.5 Directors will not divulge personal or financial information to a third-party concerning charitable giving to The Flower Cart.
- 4.6 To preserve and encourage free and open discussion by Directors at Board meetings, the details of debates are privileged and remain within the Boardroom or as otherwise agreed to by the Board.
- 4.7 In-camera discussions by the Board will be treated as confidential unless otherwise agreed to by the Board.

5. Applicability:

- 5.1 Board of Directors

6. Policy Authority:

- 6.1 Board of Directors

7. Related Policies, Procedures and Documents:

- 7.1 Policy 1.6 – Risk Management Policy

7.2 Policy 2.1 – General Duties of the Board of Directors

7.3 Policy 2.2 – Directors Code of Conduct

7.4 Policy 2.3 – Conflict of Interest

7.5 Policy 2.5 – Social Media

7.6 The Flower Cart Risk Management Plan

8. Record of Amendments:

Revision #	Summary of Revision	Date Approved
Rev 0	Original Issue	October 2007
Rev 1	Reformatted and Updated	September 27, 2011
Rev 2	Reformatted and Updated	March 28, 2017
Rev 3	Reviewed and Updated	July 07, 2021