




Privacy and Confidentiality Policy

Developed by: Suzanne Bone, Executive Director	Review or Revision by: Board of Directors, annually
Date Originated: November 2003	Review or Revision dates: Jan. 04; May 09; June 10, May 11
Approved by: Board of Directors	Signature(s): 
Approval date: May 11	Title(s): Chair

Our commitment

The Foundation of Guelph General Hospital is committed to protecting the privacy of the personal information of its donors, employees, volunteers and other stakeholders. We value the trust of those we deal with and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that is shared with us.

During the course of various projects and activities, we frequently gather and use personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of or other dealing with this information is subject to consent. Our privacy practices are designed to achieve this.

We have adopted Imagine Canada's Ethical Fundraising and Financial Accountability Code and also adhere to the Donor Bill of Rights which can be viewed on the Association for Fundraising Professional's website.

It is the policy of the Foundation that all donor, patient and staff information be held in complete confidence by anyone who has access to it in the course of their work with the Foundation.

Risk

The policy is designed to minimize the risk of loss of donor confidence and support, and adverse publicity, which would affect the Foundation's ability to raise funds to support the Hospital.

Defining personal information

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual. Exceptions: business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information.

Where an individual uses his or her home contact information as business contact information as well, we consider that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

Responsibilities/Accountabilities

Personal information gathered by our organization is kept in confidence. Our employees are authorized to access personal information based only on their need to work with the information for the reason(s) for which it was obtained. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. We also take measures to ensure the integrity of this information is maintained and to prevent its being lost or destroyed.

All employees assigned work involving donor, staff, or any level of patient information are required to keep such information completely confidential and to protect it from unauthorized examination or casual observation. All such records must be kept in a secure, locked place when not in actual use.

Deliberate violation of these rules or repeated violation due to carelessness will make the employees involved subject to discipline or dismissal.

The Pledge of Confidentiality shall be signed by all new employees and filed with their employee file.

In addition, the following persons shall complete the confidentiality pledge and have it filed in the Foundation:

1. Board members and other volunteers
2. Students
3. Contracted individuals and
4. Firms performing contract work and their employees on site.

We collect, use and disclose personal information only for purposes that a reasonable person would consider appropriate in light of the circumstances. We routinely offer individuals we deal with the opportunity to opt not to have their information shared for purposes beyond those for which it was explicitly collected.

Limits

Employees, members of the Board of Directors, and volunteers having knowledge of confidential information or access to such information may not discuss it with others in the Foundation or Hospital not concerned with such information or with individuals or groups outside the Foundation, unless specifically authorized by the President and CEO, or Chair of the Board of Directors, or required to do so in the normal course of their duties.

Employees, members of the Board of Directors, and volunteers are prohibited from removing records from the Foundation's premises for any reason except for the purpose of safeguard during fire, bomb threat or other disaster, without the express permission of the President and CEO, or Chair of the Board of Directors.

Website and Electronic Commerce

We use password protocols and encryption software to protect personal and other information we receive when a product or service is requested and/or paid for online. Our software is routinely updated to maximize protection of such information. When we work with an external provider, we ensure they use similar systems.

Updating of privacy policy

We regularly review our privacy practices for our various activities, and update our policy. Information on our most up-to-date practices can be obtained from our offices or our website.

Contact Information

Question, concerns or complaints relating to The Foundation of Guelph General Hospital's privacy policy on the treatment of personal information should be addressed to: Suzanne Bone, President and CEO at sbone@gghorg.ca, or fax (519-837-6770) or mail (115 Delhi Street, Guelph, ON N1E 4J4) or phone (519-837-6440 x2350).

Attention: Privacy officer

Further information on privacy and your rights in regard to your personal information may be found on the website of the Privacy Commissioner of Canada at www.privcom.gc.ca

Policy to be reviewed and ratified by the board annually.

Appendix

| Pledge of Confidentiality.