



CONFIDENTIALITY POLICY

SANTROPOL ROULANT

2002

Confidentiality Policy	1
Purpose	2
Statement of Intent	2
Definitions	2
Person	2
Confidential Information	3
Files	3
Lists	3
Authorized Person	3
Collection & Use	3
Collection of Information	3
Access to Personal Files	4
File Access	4
Use of Information	4
Third Parties	5
Publication	5
Practical Measures	

This policy is based on the applicable legal and ethical rules, as set out in the Civil Code of Québec, the Act respecting the protection of personal information in the private sector, the Association of Fundraising Professionals' code of ethics and guidelines, the Canadian Association of Gift Planners' code of ethics, and the Association of professional researchers for advancement code of ethics.

Confidentiality Policy

Purpose

Santropol Roulant recognizes that each person has the right to a private life and as such takes seriously the protection of the confidential information that it holds on every person, respecting the legal and ethical principles that apply to this information, as well as putting in place measures for its protection.

Statement of Intent

The intergenerational community of the Roulant uses food as a vehicle to reinforce social inclusion in Montréal and beyond. In a creative and collaborative manner, we nourish our local community with novel approaches on themes such as community engagement, urban and peri-urban food systems, food security and community support.

In accomplishing this mission, Santropol Roulant maintains a system of information that contains information on donors, supporters, volunteers and clients of Santropol Roulant. This information is of a confidential nature and remains the sole property of SANTROPOL ROULANT INC. This information is used for:

- a) Establishing and supporting communication with its community of members, named below;
- b) Offering service to its clientele;
- c) Soliciting financial and other support for Santropol Roulant;

This policy is intended to frame the collection, storage and use of this confidential information, gathered for the above purposes in conformity with the applicable laws and for the purpose of protecting the trusting relationship between Santropol Roulant and its members. This policy will be communicated to all its personnel, whether permanent, supernumerary, or under contract of Santropol Roulant, as well as any volunteer having access to this confidential information.

Definitions

Person

A physical person, such as an individual (and not a corporation or other moral entity).

Confidential Information

Principally any information concerning a member that obtains, in the exercise of their duties or mandate is of a confidential nature. In the case of an individual, any information that concerns their person and that permits them to be identified is confidential, for example :

- Name;
- Address;
- Phone number;
- Age;
- Salary;
- Civil status;
- Health status;
- Any other private, privileged or confidential information concerning a person.

In the case of a corporation, any information that isn't accessible to the public is considered confidential information.

Files

Any pages, forms, information, concepts, printed documents, any policy or procedure, conversations, messages (whether sent or received), any resource, email address lists, contracts or electronics that allow for the collection or storage of confidential information.

All forms and formats via which information can be stored and encoded, including but not limited to, paper, electronic or automatically generated copies.

Lists

Any list that includes the names, addresses or phone numbers of many people, for example, a list of donors, their phone numbers and their addresses.

Authorized Person

Any person who, in a role acting on behalf of Santropol Roulant, is authorized to access a file or information containing confidential information. A volunteer may be also authorized to have access to this confidential information if they need access to said information in carrying out the mandate of Santropol Roulant.

Collection and Use

Collection of Information

Santropol Roulant shall receive information and create a file on a person only it is necessary to do so in the accomplishment of its principle mission, whether in the meals on wheels program,

for the purposes of intergenerational events or volunteering activities. The file is created for the purpose related specifically to this mission, for example: to serve our clientele we may share information about them on the route sheets, we may collect information used to support volunteering and maintaining communication, or to build relationships with donors, or to organize an event.

Any information shall be written in an exact and objective fashion, in addition to indicating its source. Information shall be kept up to date and conserved until necessary for carrying out its specified purpose.

Access to Personal Files

Santropol Roulant acknowledges that any person has the right to know about the existence of a file that concerns them personally, as well as the content and use of such a file, and the persons who have access to it. The person has the right to consult their file, to obtain a copy, to correct it, or to remove outdated or impertinent information from their file.

File Access

For the purposes of ensuring the confidentiality of the information contained in a file, only authorized persons shall have access.

Use of Information

The information received is to be used only by authorized persons in carrying out the duties related to the file in question, and only in a way that neither violates their privacy nor jeopardizes the reputation of the person in question. For example, a volunteer cannot use confidential information received in the exercise of their mandate as a volunteer for personal or business reasons. In the same way, confidential information on a client or a paying third party, or on a donor cannot be used for the purposes of solicitation without first obtaining that person's consent.

Confidential information can be obtained by a third party or communicated to a third party without the consent of the concerned person when their life, their health or their security is in peril. For example, we may advise the referent or emergency contact person of a client during an emergency.

Third Parties

Santropol Roulant is permitted to communicate information to a third party, for instance a volunteer acting as an "authorized person" as defined above. In any other case, Santropol Roulant commits to not communicating confidential information to any third party unless the concerned person consents to this, or specifically a list of donors, and then only if the following conditions are satisfied :

1. Such communication serves the objective of philanthropic prospecting;
2. Santropol Roulant has offered donors a viable opportunity to refuse the sharing of their information with third parties.

When such a list is communicated to a third party, the third party commits to respecting this policy.

Publication

Santropol Roulant cannot publish a photograph, text or other information concerning a person unless having requested and confirmed verbal consent of that person.

Practical Measures

For the purpose of protecting the confidentiality of personal information that it holds on its members, Santropol Roulant has put in place practical measures described below.

Access to technical and informational systems of Santropol Roulant and its databases will be restricted by access codes or passwords held only by authorized persons;

In so far as possible, and considering the necessity of responding rapidly to the needs and requests of clients, only those people authorized can access physical or electronic files;

The word "Confidential" shall be clearly indicated on confidential information while it circulates outside of the offices of Santropol Roulant, for instance route sheets or volunteer request forms;

Careful attention shall be paid to the confidentiality of information concerning members of the community who would like to remain anonymous;

All measures possible must be taken by those with access to confidential information to avoid the loss, theft, exposure, misuse, reproduction, or transmission of any document, data or information, even by accidental and involuntary means. Any person having access to personal information including volunteers, shall be informed of this policy and sign the Volunteer Confidentiality Agreement;

When no longer required, all files containing confidential information must be destroyed;

The direction of Santropol Roulant is responsible for ensuring that this policy and to receive any complaint related to failures to respect it;

This policy, approved of by the board of directors, is a public document and shall be accessible to anyone who requests it.