

Labourview Housing Cooperative Inc.

Policy Name:	Confidentiality Policy
Contact Officer:	Sherry Houle, 519-351-8832
Date Approved by Board of Directors:	N/A
Date Approved by General Membership	N/A
Date Certified:	N/A

Reference:

Social Housing Social Reform Act 2000, 339/01, Sect 4-6

1. INFORMATION AND CONFIDENTIALITY:

Individuals will, on request, have access to any personal information about themselves that the co-op has, subject to the *PIPED Act*, the *Social Housing Reform Act*, the *Co-operative Corporations Act* and the co-op by-laws.

The Co-op will correct any errors in personal information that the individual brings to the co-op's attention. If any member believes that there is an error in their personal file or accounts, co-op staff should try to correct the problem. If the co-op staff does not think that there is a mistake, they should explain the record to the member. If the member is still not satisfied, the member can take the matter to the board by following the procedure outlined below in Section 2.

2. Procedures for Complaints:

The co-op will appoint a Personal Information Protection Officer. Members can bring complaints about the handling of personal information to the Personal Information Protection Officer.

The Personal Information Protection Officer will ensure that the co-op follows the *Personal Information Protection and Electronic Documents Act* and its principles, and the personal information and confidentiality provisions of the co-op's by-laws and occupancy agreements as applicable. The officer will receive and follow up on any enquiries or complaints about how the co-op collects, uses and shares personal information.

If the Personal Information Protection Officer receives a complaint about how the co-op deals with personal information, the Officer will:

- a. Ask for the complaint in writing. The officer can assist the person by writing the complaint for them and reading it back to them. The person must sign the complaint.
- b. The officer will investigate the claim and determine if it is valid and if it is something that the *PIPED Act* covers.
- c. If the complaint is valid, the officer will try to correct the situation. This may mean proposing changes to the co-op by-law, policy or procedure. The officer's recommendations will be presented to the board for discussion and decision.
- d. The officer will contact the person and let them know, both verbally and in writing the results of the investigation. If it was a valid complaint, the officer will inform the person of the action the co-op will take to correct the situation. The officer will apologize on behalf of the co-op for any inconvenience or embarrassment.
- e. If the person is not satisfied with the results of the investigation, the officer will let the person know how to contact the Federal Privacy Commissioner.

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3. Confidentiality of Board and Committee Business:

- a. Sometimes directors or committees discuss confidential matters. All directors and committee members must keep these matters secret, even after they are no longer directors, members of the committee, or members of the co-op.

Confidential matters are:

- i. personal and financial information about members and other residents
 - ii. personal information about co-op employees
 - iii. information about co-op business which should be kept secret to protect the co-op.
- b. Officers, employees or members sometimes learn confidential information. They must keep that information secret and not pass it on to anyone else.
 - c. When the board discusses confidential matters, the minutes of these discussions must be kept in a separate section of the minute book. Only board members can see the confidential minutes.
 - d. Directors must decide which items are confidential. They should remember that members have the right to be fully informed about the co-op's business. They must have good reason for keeping something confidential.
 - e. Confidential and other personal information may be made available to the board as stated in this By-law and the Occupancy By-law.
 - f. Directors and committee members should sign the Confidentiality Agreement form that is attached to this By-law as **Schedule J - Confidentiality Agreement**.

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Schedule J

Confidentiality Agreement

I agree that I will not tell anyone any confidentiality information that I know through my possession with the co-op or that I learn while at board or committee meetings unless authorized by the board of the co-op to disclose it. This applies while I am a member/staff of the co-op and after I leave the co-op.

Confidential information:

- Personal and financial information about members
- Personal information about employees, and
- Information about co-op business which should be kept secret to protect the co-op

Name: _____

Signature: _____

Date: _____