



Policy 2.1.27

Approved – February 4 th , 2022
Committee – Diocesan Council
Source – Human Resources VSST

Confidentiality and Non-Disclosure Agreement

The Diocese of Nova Scotia & Prince Edward Island

Statement of Intent

The Diocese of Nova Scotia and Prince Edward Island (the Diocese) requires all employees and volunteers to handle any and all sensitive information regarding confidential materials, personnel information (including Synod Office, Cathedral Office, and all Parish volunteers and staff), and all pending business and financial transactions gained through the course of their regular duties in a appropriate and confidential manner.

Employees and Volunteers agree that if confidential information is not effectively protected, the ministry and reputation of the Diocese may be threatened and suffer irreparably. Employees and Volunteers of the Diocese must not disclose any confidential information and/or relevant knowledge regarding the Diocese, its personnel, and volunteers, both during and after their term of employment and/or volunteer engagement. These practices have been adopted as they have been deemed essential for the protection of the Diocese.

Definition

Confidential information means all information, whether reduced or not reduced to written or recorded form, marked as confidential or not, furnished by, received by, or accessible through the Diocese, or compiled, contributed, or developed by an employee or volunteer, that is related to actual or anticipated policies, judgments, publications, or business of the Diocese, and that is not generally known beyond the Synod Office of the Diocese, nor intended for general dissemination. This information includes, but is not limited to:

- Information relating or pertaining to computer software and documentation, publications, files, personnel, contact lists, supplier/employee/volunteer information, working papers, reports, mailing lists, procedures, manuals, financial policy information, budgets, employment records and data, terms of contracts and agreements to which the Diocese is a party;
- Business and strategic plans, investment policies, or business policies or practices, whether disclosed to an employee by: plans, drawings, reports, sketches, photographs, graphs, or other written materials or documents; conversation with the Diocese employees or agents; third parties to whom the Diocese owes a duty of confidentiality; observation or inspection of physical objects or displays; or any other method;

- All objects, documents, and other materials which contain or otherwise reflect such information, all analyses, compilations, studies, data, or other records or documents prepared by or for employees which contain or otherwise reflect such information, and any information, whether marked confidential or not, derived by examination, testing, or analysis of any such information; and
- Information of a personal or pastoral nature respecting any member of the Anglican Church resident within the Diocese of Nova Scotia and Prince Edward Island.

Personal information is any recorded information about an individual, the disclosure of which may constitute an unreasonable breach of personal privacy. Personal information includes:

- race, national or ethnic origin, colour, sexual orientation, age, or marital status
- education, medical, criminal or employment history
- information about financial transactions
- any assigned identifying number (i.e., employment number)
- address, fingerprints, or blood type

The disclosure of the following types of personal information is not considered an invasion of a person's personal privacy:

- the person has agreed in writing to the release of specific personal information
- the position held, the office telephone or email of the person
- the salary or salary range of the person if known in the public domain

Parameters

In their labours for the Diocese, employees and volunteers shall not divulge, disclose, provide, or disseminate confidential information to any third party not employed by the Diocese at any time, unless the Diocese gives written authorization. Furthermore, confidential information shall not be used for any purpose other than its reasonable use in the normal performance of employment and volunteer duties for the Diocese. Reasonable efforts will be made to limit access to confidential information to only those who need to know, and those persons will be advised that the information is to be kept confidential until it has been publicly disclosed by a Diocesan spokesperson.

Employees and volunteers who are neither official spokespersons nor permanently or temporarily designated spokespersons cannot, under any circumstances (including on a "no-names" or "off the record" basis), respond to inquiries from the media, or any other investigative source, unless specifically asked to do so by the Bishop or the Executive Director of the Diocese. All inquiries, including those from the media and the public, are to be referred to the Executive Director.

This policy is not intended to prevent disclosure where disclosure is required by law.

Oversight and Report

All questions and concerns about this policy, suspicions, or reports concerning breach of this policy should be addressed, in writing, to the Executive Director (HR) of the Diocese. In the event of a suspected conflict of interest, such a report may be made in writing to the Bishop of the Diocese, outlining both the suspected conflict of interest and the concern related to this policy. As a Human Resources policy, findings of any breach may or may not be made public in accordance with applicable Human Resources legislation. As noted in the **Acknowledgement and Agreement**, failure to adhere to this policy will subject

the person(s) who made unauthorized disclosure to appropriate discipline, up to and including separation of employment or service with the Diocese.

Acknowledgement and Agreement

It is the policy of the Diocesan Synod of Nova Scotia and Prince Edward Island that employees and volunteers of the Diocese will not disclose confidential information belonging to, or obtained through, their affiliation with the Diocese — as outlined in the above **Statement of Intent** — to any person, including their relatives, friends, business associates, professional associates, and church contacts, unless the Diocese has authorized disclosure.

Employees and volunteers are cautioned to demonstrate professionalism, good judgement, and care to avoid unauthorized or inadvertent disclosures of confidential information and should, for example, refrain from discussing confidential information that could be overheard by unauthorized individuals and take care that documents containing confidential information are not left in the open or inadvertently shared by any means.

Such information must be kept confidential both during and after employment or volunteer service. Employees and volunteers, including all council, committee, and task group members, are required to return all documents, papers, reports, and all other materials containing confidential information at the time of separation from employment or service. Separation from employment or service includes the completion of a voluntary term of office.

Failure to adhere to this policy will subject the person(s) who make unauthorized disclosure to appropriate discipline, up to and including separation of employment or service with the Diocese.

I, _____, acknowledge that I have read and understand the Confidentiality and Non-disclosure Agreement of the Diocese of Nova Scotia and Prince Edward Island. I agree to adhere to this policy and will ensure that employees and volunteers working under my direction adhere to this policy. I understand that if I violate the rules set forth by this policy, I may face disciplinary action up to and including termination of employment or service.

Name (please print)

Signature

Date

Witness

Date