

<b>THUNDER BAY REGIONAL RESEARCH INSTITUTE STATEMENT of POLICY and PROCEDURE</b>			
Manual:	Board Policy Manual	SPP No.	<b>GN-07-01</b>
Section:	Governance and Nomination	Issued:	May 27, 2011
Subject:	<b>CONFIDENTIALITY</b>	Effective:	May 27, 2011
Issue to:	Members, Directors and Employees	Page:	1 of 3
		Replaces:	June 14, 2010
Issued by:	Mr. Michael Power, CEO Mr. Keith Jobbitt, Chair	Dated:	June 14, 2010

This policy applies to all Members, Directors and Employees of the Thunder Bay Regional Research Institute (TBRI).

This policy is to be read in conjunction with the Thunder Bay Regional Research Institute Bylaws section 8.4 on Confidentiality.

Breaches of this policy may result in discipline up to and including termination for cause.

### **Definition of Confidential Information**

Confidential information would include, but not be limited to:

- Business information (research project information, Intellectual Property information, research processes, patents, financial and statistical information, strategic planning, internal reports, etc);
- Employee information (employment records, salaries, family and/or personal circumstances, etc);
- Personal health information (medical records, conversations concerning an individual's condition or treatment, financial circumstances, family circumstances, etc).;
- The identification of which individuals have access to the aforementioned confidential information.

### **Access to Confidential Information**

Individuals may become aware of confidential information either by hearing such information or by viewing written material. This would include having access to such information through TBRI computer systems.

Information concerning research participants and their families, donors, colleague workers and information pertaining to the business operations of TBRI must be held in strict confidence.

Individuals will access confidential information only to the extent necessary to carry out their duties at TBRI. They will not in any way copy or release such information to any other individual, including copying or transmitting such information electronically, except as required in the performance within the necessary parameters of their work. Individuals

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must never mention any information concerning the employees, donors, the business operations of TBRI or the condition of any research participant or make reference to the nature of a research participant's illness to any individual inside or outside TBRI.

This is an ethical trust which TBRI has placed with all individuals who work within TBRI or act on its behalf.

### **Handling of Confidential Material**

1. Confidential materials will be circulated in sealed envelopes or storage cases.
2. Confidential material envelopes will be addressed and marked "PERSONAL AND CONFIDENTIAL". These envelopes are to be opened only by the persons to whom they are addressed or by persons designated by managers as being responsible for handling confidential material.
3. The recipient of confidential material will handle it appropriately and, when finished with the documents, place them in shredding receptacles located throughout the TBRI.
4. If faxing confidential material to any other locations, the sender shall telephone the intended recipient before sending and arrange for the recipient to be standing by to receive the fax. Where possible, fax numbers should be programmed into the speed dialing feature of fax machines to avoid the risk of misdialing.

### **Storage of Confidential Material**

1. At the end of the working day, individuals must lock desks, filing cabinets, and any other storage cabinets containing confidential material; they should keep them closed and secure at all other times.
2. Individuals must log off their computer when they are to be away from a terminal unless access to the computer can be secured.
3. Computer passwords are to be changed regularly (users will be prompted to change their passwords) and users shall not use a password which they have used previously.
4. Individuals must safeguard and must not disclose their computer access codes or any other authorization mechanisms they have which allow them access to confidential information. They are responsible for all activities undertaken using their access code or other authorizations, except where their code or other authorization was obtained by fraudulent means and the individual could not have prevented such unauthorized use through diligent precautionary measures.

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5. Where possible, computer monitors should be positioned so that they cannot be seen easily by anyone other than the user.

### **Breaches, or Suspected Breaches, of Confidentiality**

1. Any Member, Director or Employee who becomes aware of a breach of confidentiality, or suspects that a breach has occurred, is to report the incident to the Chair of the Board of TBTRI. Confidentiality breaches identified through auditing processes will also be reported to the Chair of the Board of TBTRI.
2. An investigation of any reported breach (or suspected breach) will be conducted as expeditiously as possible. The purpose of the investigation is to gather all relevant facts and may include interviews with any affected parties.
3. Any breach of confidentiality is considered by TBTRI to be serious. Such breaches shall include but are not limited to, cases where an individual intentionally accesses and/or reveals confidential information, particularly where his/her actions are found to be motivated by malice or personal gain and breaches which are inadvertent or accidental.
4. Where it is established that a breach has occurred, the determination of what disciplinary action is appropriate in the circumstances will be determined by:
  - a) TBTRI management for employees;
  - b) the Board of Directors for Members; and
  - c) the Corporate Membership for Directors.

This includes the possibility that certain breaches may result in discipline up to and including termination for cause of a Member, Director or Employee.
5. In the case of a breach of confidentiality through computer access, future auditing of the individual's access will be done at the discretion of the Chair of the Board.

### **Orientation**

This policy is to be reviewed with all new Members, Directors and Employees upon admission to TBTRI Membership, appointment to the Board or employment. These individuals must be given a copy of the policy and sign an acknowledgement.