



# POLICY

POLICY MANUAL SECTION Human Resources	POLICY NAME Confidentiality	POLICY NUMBER HR - 504
POLICY MANUAL SUBSECTION	RESPONSIBILITY Senior Director, People & Culture	APPROVED BY CEO
LAST REVIEW DATE December 2025	LAST APPROVAL DATE December, 2025	NEXT REVIEW DATE December, 2027

## SCOPE

This policy applies to employees, students and non-Board volunteers<sup>1</sup> of Lumenus Community Services (Lumenus). It establishes expectations for the use and maintenance of information received in the course of their duties with Lumenus.

## POLICY

Maintaining confidentiality and privacy of information is the responsibility of all employees, students and volunteers at Lumenus. All have a duty to protect the confidentiality of any information received from or pertaining to the organization and its clients and to ensure that it is used as authorized and does not result in harm to an individual or pose any risk to the organization.

- Confidential information includes, but is not limited to, the following:
- Client records and client information;
- Electronic files, records, emails, text messages, or any client information posted on social media platforms (Refer to **MCOM-902 Lumenus Social Media Accounts**);
- Personnel records including students and volunteers;
- Employee, student, and volunteer personal information;
- Board related information;
- Donor information, contact information, gifting history;
- Confidential business information related to the operation of Lumenus such as trade secrets, inventions and proprietary information or information related to suppliers, referral sources or community partners; and,
- Any information deemed by management to be confidential.

For detailed requirements and procedures for the protection and confidentiality of client information, please refer to specific Lumenus policies on that topic.

<sup>1</sup> Confidentiality requirements for members of the Board and its committees are set out in a separate confidentiality policy approved by the Board.

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## PROCEDURE

Employees, Students and Volunteers shall:

- Ensure that confidential information pertaining to Lumenus and its clients, employees, students or volunteers is not disclosed to anyone other than persons who are authorized to receive such confidential information;
- Exercise caution in the dissemination of confidential information in person or when using a telephone, computer systems, electronic files, email, fax machine or virtual meeting platform;
- Ensure that confidential information is not left unattended on desks or computers;
- Read and sign a Statement of Confidentiality at the time of hire or placement, which is maintained in the employee file; and,
- Recognize that disclosure of confidential information is viewed as a serious breach and is subject to disciplinary action up to and including termination of employment or placement.

Employee medical information is confidential and is to be maintained in a confidential folder in the employee's WFN files. Access to employee medical information is limited to People and Culture Management and their designate on a need-to-know basis only.

Where a breach or suspected breach of confidentiality has occurred, the employee, student or volunteer will immediately notify their manager who will be responsible for ensuring senior management and the Lumenus Privacy Officer are advised. A breach of confidentiality is subject to disciplinary action up to and including termination of employment or placement.

If an employee, student or volunteer is unclear about requirements and the proper procedure for maintaining the confidentiality, privacy and security of information they must discuss with their manager who will advise and/or refer the matter to Lumenus's Privacy Officer or other staff.

