



## HR-1 Confidentiality Policy

Department: Human Resources

### Purpose

The County of St. Paul No. 19 (the County) supports the need to hold confidential, privileged, proprietary, or personal and private information confidential and limit access only those who have a legitimate need to know to complete or fulfill their job or volunteer duties or functions. Respecting the privacy of our ratepayers, service providers, community groups, County staff, volunteers, and of the County itself is a basic value, expectation, and a legal requirement under Alberta's *Freedom of Information and the Protection of Privacy Act* (the *FOIP Act*).

### Scope

This policy applies to all County employees and volunteers, whether on the worksite of the County, working offsite, or working remotely.

### Policy Definitions

**Confidential, privileged, proprietary, or personal and private information** means any information which is not public property, or in the public domain, and/or would cause harm to individuals or the County if improperly disclosed. Information within this category includes information communicated in confidence, either by being expressly identified as confidential, or because the character of the information is obviously confidential or reasonably ought to be known as confidential. Information provided that is personal or private, and under the protection of the *FOIP Act* also falls into this category of information.

**Employees** means seasonal, permanent full-time, permanent part-time or anyone who works on a contract basis for the County.

**Management** means the director of a department to which the employee reports into.

**Unauthorized individuals** means any individual that does not or should not have access to or control of the confidential, privileged, proprietary, or personal and private information for any reason.

**Volunteer** means a person who performs a task for charitable, humanitarian, or civic reasons without the expectation, promise or receipt of any compensation for their work.

### Policy Statements

#### General Matters

It is the responsibility of the County Chief Administrative Officer (CAO), to ensure that the County's management is aware of this Policy and are communicating it to their respective staff. Any administrative procedures, processes, or forms required to support this Policy are the responsibility of the County administration as delegated by the CAO.

# COUNTY OF ST. PAUL NO. 19

*Our Mission - To create desirable rural experiences*



## Expectations

Those who work for or volunteer with the County may be exposed to information, which is confidential, privileged, proprietary, or personal and private in nature through the course of their employment or association with the County in order to complete their job or volunteer duties or function. As such, they are expected to maintain all information and knowledge gained as a result of their employment or association with the County in the strictest of confidence and in accordance with applicable privacy legislation and County policies and procedures, as amended from time-to-time.

Employees and volunteers must be attentive to the information that they are in control of, have access to, or exposed to, ensuring that:

- individuals do not overhear any discussion of confidential, privileged, proprietary, or personal and private information, and
- documents containing confidential, privileged, proprietary, or personal and private information are not left in the open, accessible by others, or shared with others who do not have the need to know the content of those documents.

County employees or volunteers who may overhear or encounter confidential, privileged, proprietary, or personal and private information or conversations in the course of their duties are expected to maintain all information and knowledge in the strictest confidence.

This Policy confirms that information, which is confidential, privileged, proprietary, or personal and private in nature must be kept confidential. County employees and volunteers are expected to return materials containing confidential, privileged, proprietary, or personal and private information at the time of separation from employment or expiration of service.

## Unauthorized Access, Control, or Disclosure

Unauthorized access, control, or disclosure of confidential, privileged, proprietary, or personal and private information, is a serious violation of this Policy. This violation will subject any employee who has unauthorized access or control or has made unauthorized disclosure, to discipline under the Performance Improvement and Progressive Discipline Policy, up to and including termination. In the case of a volunteer, their association with the County will be severed. Depending on the severity of the violation, the County may choose to pursue legal action as required.

## **Related Policies**

- Code of Conduct, Ethics, and Conflict of Interest Policy
- Use of and Access to Municipal Technology and Equipment Policy

Supersedes Policy HR-1 Employee Ethics Policy; HR-8 Confidentiality Policy  
Council Approval: October 12, 2021

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## CONFIDENTIALITY POLICY – ACKNOWLEDGEMENT

I certify that I have read the County of St. Paul (the County) Confidentiality Policy (the Policy).

I agree to abide by the requirements of the Policy and inform my supervisor/manager/director immediately if I believe any violation (unintentional or otherwise) of the Policy has occurred.

I understand that violation of the Policy will lead to disciplinary action, up to and including termination of my service with the County.

I acknowledge that I have received a copy of the County of St. Paul Employee Handbook, along with the detailed policies and procedures, and have read and will follow these policies and procedures.

I understand that if I have any questions, I should direct them to my supervisor/manager/director.

I also acknowledge and agree that the County may, with reasonable notice, change, add to, or delete the provisions of this Policy or any of the County's policies and procedures.

Signature \_\_\_\_\_

Name \_\_\_\_\_ Date \_\_\_\_\_