



# Confidentiality Policy

Adopted Date	September 16, 2025
Revision Date	
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## CONFIDENTIALITY POLICY

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### **Policy**

Nipissing First Nation (NFN) recognizes its obligation to safeguard confidential, sensitive, and proprietary information obtained in the course of its operations. Employees and representatives are required to protect such information and only use it for legitimate NFN business purposes.

### **Purpose**

The purpose of this policy is to:

- a) Protect NFN's information, records, and data from unauthorized disclosure.
- b) Ensure compliance with privacy legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA) and Ontario's Personal Health Information Protection Act (PHIPA)
- c) Provide clear guidelines for employees on handling confidential information.

### **Scope**

This policy applies to all NFN employees, volunteers, students, contractors, Council members acting in an employment capacity, and any individual with access to NFN information.

### **Definitions**

"Confidential Information" includes, but is not limited to:

- a) Employee and member personal information.
- b) Financial records, contracts, and business information.
- c) Council discussions, legal matters, and administrative records.
- d) Any non-public information learned through NFN employment or involvement.

### **Policy Requirements**

Employees shall:

- a) Only access or use confidential information necessary for their role.
- b) Not disclose confidential information to unauthorized persons inside or outside the organization.
- c) Not use NFN information for personal benefit or gain.

Employees must maintain confidentiality:

- a) During employment.
- b) After leaving employment.

Exceptions:

- a) Information may be shared when required by law, with prior authorization from a supervisor or CEO.



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### **Administrative Management**

All employees must review and sign the Confidentiality Letter of Agreement (Appendix A) as a condition of employment, and annually thereafter.

Breaches of confidentiality will result in corrective or disciplinary action, up to and including termination.

### **Alignment with the Canada Labour Code**

This policy supports the Canada Labour Code and applicable privacy legislation by requiring the secure handling of sensitive information.

### **Review and Updates**

This policy will be reviewed periodically and updated to reflect changes in legislation or organizational practices.



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### Appendix A – Confidentiality Letter of Agreement

I, \_\_\_\_\_, acknowledge that in the course of my employment with Nipissing First Nation (NFN), I may have access to confidential information.

I agree that:

1. I will not disclose confidential information to unauthorized persons during or after my employment.
2. I will not use confidential information for personal gain or to the detriment of NFN.
3. I will return all documents, records, and property containing confidential information upon termination of employment.
4. I understand that a breach of this agreement may result in disciplinary action up to and including termination, and possible legal action.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_