 The College of Naturopaths of Ontario	Policy Type GOVERNANCE PROCESS	COUNCIL POLICIES
	Title Confidentiality	Policy No. GP12.01
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All members of the Council and Committees, staff and persons retained or appointed by the College are required to maintain confidentiality of the information that comes before them in the course of discharging their duties.


Definitions	Confidential Information	Means personal information and trade secrets concerning the business of the College and its members and stakeholders including, without limitation, member and stakeholder lists, telephone sales techniques, training seminars and programs, financial and contractual relations, sales and financial information, documents recording College products, volumes, procedures, research, development, engineering, manufacturing, purchasing and other aspects of the College's operations.
	Personal information	Means recorded information about an identifiable individual, including, <ul style="list-style-type: none"> (a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual, (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved, (c) any identifying number, symbol or other particular assigned to the individual, (d) the address, telephone number, fingerprints or blood type of the individual, (e) the personal opinions or views of the individual except where they relate to another individual, (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence, (g) the views or opinions of another individual about the individual, and (h) the individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.¹

Accordingly,

- 1 All Council and Committee members, and persons appointed by the College to perform duties on behalf of the College shall keep confidential all information that comes to his or her knowledge in the course of his or her duties and shall not communicate any information to any other person.
- 2 Subsection 36(1) of the *Regulated Health Professions Act, 1991* permits the disclosure of information in certain circumstances. All Council and Committee members and appointees of the College are expected to understand when those exceptions apply and seek advice of the Chief Executive Officer (CEO) and Legal Counsel.

¹ Freedom of Information and Protection of Privacy Act, RSO 1991, c.F31

DATE APPROVED	DATE LAST REVISED
July 30, 2013	January 27, 2021

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- 3 Shall review and sign the “Acknowledgment and Undertaking regarding Fiduciary Duties” or a Confidentiality Agreement provided by the CEO prior to assuming their responsibilities and duties on behalf of the College.

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July 30, 2013	January 27, 2021