



GRAND RIVER  
HOSPITAL

**GOVERNANCE MANUAL**

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Approved By:	Board	Number:	3-B-3
Date Issued:	November 28, 2006		
Last Review Date:	February 22, 2022	Last Revision Date:	February 22, 2022
SUBJECT:	<b>Confidentiality Policy</b>		

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**Purpose**

To ensure that personal information and/or confidential information that comes before the Board and board committees is collected, used or disclosed in compliance with Ontario privacy legislation, and with the authorization of the Board.

**Policy**

Directors and Community Committee (non-director) Members owe to the hospital a duty not to disclose or discuss with another person, entity or the media, or to use for their own purpose, confidential information concerning the business and affairs of the hospital received in their capacity as Directors unless otherwise authorized by the Board.

Directors are responsible for treating personal health information and personal information as confidential information as required by legislation.

**Application**

This policy applies to all Directors and Community Committee (non-director) Members.

**Confidential Matters**

All matters that are the subject of closed and in-camera sessions of the Board are confidential until disclosed in an open session of the Board.

All matters that are before a committee or task force of the Board are confidential, unless they have been determined not to be confidential by the Chair of the relevant committee or task force, or by the Board.

All matters that are the subject of open sessions of the Board are not confidential.

**Collection, Use and Disclosure of Confidential Information**

Directors have a duty to hold information in confidence and to use it only for purposes of the corporation and not for personal gain. Collection, use or disclosure of confidential information must comply with hospital policies, the Freedom of Information and Protection of Privacy Act (2012) and the Personal Health Information and Protection of Privacy Act (2004).

**Procedure for Maintaining Minutes**

Minutes of closed and in-camera sessions of the Board shall be recorded by the Secretary or designate, or if the Secretary or designate is not present, by a Director designated by the Chair of the Board.

All minutes of closed and in-camera sessions of the Board shall be marked confidential and shall be handled in a secure manner.

All minutes of meetings of committees and task forces of the Board shall be marked confidential and shall be handled in a secure manner.

Notwithstanding that information disclosed or matters dealt with in an open session of the Board are not confidential, no Director shall make any statement to the press or the public in his or her capacity as a Director unless such statement has been authorized by the Board.

**References:**

- Grand River Hospital's By-Law
- Ethics Policy
- Code of Conduct
- Conflict of Interest
- Board Responsibilities and Accountabilities
- Roles and Responsibilities of Directors
- Roles and Responsibilities of Community Committee Members
- Decision Making Framework
- Annual Director and Community Member Declaration and Consent
- Access, Use and Disposal of Hospital Devices and Information