

ASTTBC Confidentiality POLICY

Policy Subject	ASTTBC Confidentiality Policy
Policy Section	
Policy Number	
Approving Authority	ASTTBC Board
Revision	V1.0
Approved Date	January 19, 2023
Responsible Officer	Registrar
Next Policy Review Date	TBD

1.0 REASON FOR POLICY

- 1.1 Board and committee members, including any qualified individual appointed to assist the Board or a Committee in carrying out their statutory duties, must preserve the confidentiality of information they acquire in the course of their duties pursuant to section 109 of the *PGA*.
- 1.2 For clarity, the *PGA* stipulates a person must preserve confidentiality with respect to all matters or things that come to the person's knowledge while exercising a power or performing a duty under the *PGA* unless the disclosure is
 - (a) necessary to exercise the power or perform the duty, or
 - (b) authorized as being in the public interest by, as applicable,
 - i. the superintendent, or
 - ii. the board of the regulatory body in relation to which the power or duty is exercised or performed.
- 1.3 The Board is collectively responsible for:
 - (a) adopting a confidentiality policy; and
 - (b) reviewing the policy and procedures regularly to ensure that they adequately meet the policy objectives
- 1.4 Board and committee members, including any qualified individual appointed to assist the Board or a Committee in carrying out their statutory duties, have a duty to maintain confidentiality with respect to all matters that come into their knowledge or possession while exercising their power or performing their duties on the Board, on any committee appointed by the Board, or in the course of performing any duties under the *PGA*, the *regulations*, or *bylaws*.

2.0 APPLICABILITY

- 2.1 This policy applies to:
- (a) all Board and committee members, including any qualified individual appointed to assist the Board or a Committee in carrying out their statutory duties, to ensure that confidential matters are not disclosed until disclosure is authorized by the Board, and are communicated in a manner consistent with the Board's Communication Policy.
 - (b) All Board and committee members, including any qualified individual appointed to assist the Board or committee in carrying out their statutory duties and creates an ongoing obligation which will continue to apply to board and committee members and appointed qualified individuals during the period of the work and continues after their duties have ended.
- 2.2 All Board and committee members are individually responsible for adhering to this confidentiality policy.

3.0 POLICY STATEMENT

- 3.1 A Board or committee member or appointed qualified individual must not
- (a) disclose or discuss with another person or entity (including family, friends, colleagues, or others); or
 - (b) use for his or her own purpose,
information concerning the business and other affairs of ASTTBC which the member has received as a Board or committee member or appointed qualified individual in the course of their duties under the *PGA*, the *regulations*, or *bylaws*.
- 3.2 Board and committee members, including any qualified individual appointed to assist the Board or a Committee in carrying out their statutory duties, must take reasonable steps to properly secure the source or location of the information that is in a member's possession or control (specifics of which to follow below).
- 3.3 As part of the duty of confidentiality, a Board or committee member, including any qualified individual appointed to assist the Board or a Committee in carrying out their statutory duties, must not, unless explicitly authorized to do so by the Board and in a manner consistent with the Board's communication Policy,
- (a) permit any unauthorized person to inspect or have access to any confidential documents or other information, or
 - (b) make statements to the press or public on behalf of ASTTBC, the Board, a specific committee, or themselves in their capacity as a Board or committee member or appointed qualified individual.
- 3.4 Confidential matters include but are not limited to:
- (a) all matters that are subject of in camera sessions of the Board, until such matters are disclosed in an open session of the Board; and

- (b) all matters before a committee, unless they have been determined not to be confidential by the chair of the relevant committee
 - (c) Confidential matters do not include all matters that are the subject of open sessions of the Board
- 3.5 Board and committee members, including any qualified individual appointed to assist the Board or a Committee in carrying out their statutory duties, are expected to be proactive in identifying and reporting any breach of this policy.
- 3.6 If a Board or committee member, including any qualified individual appointed to assist the Board or a Committee in carrying out their statutory duties, has reason to believe that a breach in this policy has occurred, whether by themselves or another Board or committee member or appointed qualified individual, they should report it to the Registrar immediately.
- 3.7 Procedure for management of minutes
- 3.7.1 Minutes of closed sessions of the Board shall be recorded by the Secretary or designate, or if the Secretary or designate is not present, by a Board member designated by the Board Chair.
 - 3.7.2 All minutes of in camera sessions of the Board shall be marked confidential and be handled in a secure manner.
 - 3.7.3 All minutes of meetings of committees shall be marked confidential and be handled in a secure manner.
 - 3.7.4 Notwithstanding that information disclosed or matters dealt with in an open session are not confidential, no Board member shall make any statements regarding such information to the press or to the public on behalf of ASTTBC, a specific committee, or themselves in their capacity as a Board or committee member, unless explicitly authorized by the Board and in a manner consistent with the Board's Communications Policy.
- 3.8 Process for Handling Confidential Materials
- 3.8.1 Physical Documents
 - 3.8.1.1 All confidential documents received by the Board during in camera sessions of the Board shall, unless otherwise authorized by the Board Chair, be collected at the end of the session by the Registrar or another staff person designated by the Board chair and disposed of in a fashion that preserves the confidentiality of the documents (e.g., shredding).
 - 3.8.1.2 All confidential documents received by Board and committee members, including any qualified individual appointed to assist the Board or a Committee in carrying out their statutory duties, shall be kept confidential while being used by the Board and committee members in the course of their duties. Once such confidential documents are no longer required, the confidential documents shall be disposed of in a fashion preserving the confidentiality of the documents (e.g., shredding) or be returned to ASTTBC for disposal.

3.8.2 Electronic Documents

3.8.2.1 Board and committee members, including any qualified individual appointed to assist the Board or a Committee in carrying out their statutory duties, must ensure they have secured confidential e-mails, and other confidential documents, received during the course of ASTTBC activities. Board and committee members must implement reasonable measures to secure access to the computers, or to the email systems, by which they receive and store confidential electronic information.

3.8.2.2 All confidential email and other confidential electronic documents received by the Board and committee members, including any qualified individual appointed to assist the Board or a Committee in carrying out their statutory duties, must be permanently deleted when the documents are no longer being used in the course of ASTTBC activities. Board and committee members and appointed qualified individuals shall make a regular practice of culling all confidential e-mails and other confidential electronic documents when they are no longer in use.

3.8.2.3 All print outs of confidential email and other confidential electronic documents must be treated like other confidential physical documents.

3.8.3 Any improper loss or disclosure of confidential information must be reported to the Registrar immediately. This may include situations where a Board or committee member or appointed qualified individual temporarily or permanently loses custody of confidential information for any reason, such as due to theft.

I acknowledge that I have read and understood ASTTBC's Confidentiality Policy and agree to conduct myself in accordance with it.
Signature:
Name:
Date: