

Confidentiality Policy - Camps

This document outlines the fundamental objectives setting forth the confidentiality policies for Plast USO (“Plast”). It is not the intent of this policy to circumvent state or federal law; state and federal law take precedence over any statement made in this policy.

Scope of this Policy

The purpose of this confidentiality policy is to ensure that the highest ethical standards and integrity are maintained in conducting the business of Plast and carrying out its mission with respect to all overnight camps. All Camp Leaders, Employees and Volunteers are subject to this confidentiality policy and shall exercise good faith and judgment in all dealings relating to his or her position with Plast. Disclosures by these individuals inconsistent with this policy shall not be permitted unless expressly approved by the Second Vice President of Programs, who is a member of the National Board of Directors.

Definitions

National Board of Directors (Directors) – shall refer to the Plast National Board of Directors, the governing body established by the Plast Bylaws.

Camp Leaders – Members of OTK or Camp Administration (for spec tabory and vyshkil)

Employees – shall refer to any person working for Plast as non-exempt, exempt or on a contract basis.

Volunteers – shall refer to any person who performs a service for Plast without pay.

Appropriate Person – shall refer to the leader of the specific camp:

- in the case of the three “oseli” this will be the head of OTK;
- in the case of a training camp (vyshkil) this will be the leader of this camp;
- in the case of special camps (spec tabory), this will be the leader of this camp approved by the Directors..

Confidential Information – shall refer to information, in any form or medium (e.g., verbal, written or electronic), including notes, copies and summaries, maintained, received, created or requested by Plast or any member of the National Board of Directors or member of OTK that identifies, or can be used to identify, any individual. It also relates to business meetings, where there is discussion of sensitive topics regarding past, present or future actions and activities as well as financial, legal, human resources or other matters that may hinder Directors, Camp Leaders, Employees or Volunteers to operate effectively and work business topics. Examples of Confidential Information include (not an exhaustive list):

- Member and Camper records
- Computerized member and camper data
- Medical records or information of campers and members or their family members
- Detailed donor demographics (including but not limited to names, addresses, amounts donated, etc.)
- Internal financial reports
- Any human resource information about Directors, employees or volunteers
- Contracts with vendors

- Disciplinary records and notes (including, but not limited to names, discussion notes, summaries of parental calls as well as incident reports).
- Contracts with vendors
- Disciplinary records and notes
- Employee files
- Legal agreements and settlements
- Any verbal information provided in reference to the above

General Information

It is the policy of Plast that camp leaders, employees and volunteers may not disclose, divulge or make accessible Confidential Information belonging to, or obtained through, their affiliation with the organization to any person, including relatives, friends and business and professional associates, members of the media, other than to persons who have a legitimate need for such information and to whom the organization has authorized disclosure. The Camp Leader can use their judgment when determining “legitimate need” and is subject to review by the Chief Corporate Officer or Second Vice President who shall have authority to refuse or revoke. Camp Leaders, employees and volunteers shall use Confidential Information solely for the purpose of performing services as a camp employee or volunteer for the organization. This is not intended to prevent disclosure where disclosure is required by law.

Camp leaders, employees and volunteers must exercise good judgment and care at all times to avoid unauthorized or improper disclosures of Confidential Information. Conversations in public places should be limited to matters that do not pertain to information of a sensitive or confidential nature. In addition, Camp leaders, employees and volunteers should be sensitive to the risk of inadvertent disclosure and should, for example, refrain from leaving Confidential Information on desks or otherwise in plain view and refrain from the use of speakerphones to discuss Confidential Information if the conversation could be heard by unauthorized persons. Adherence to this policy extends beyond the camp leaders, employees’ and volunteers’ employment or volunteer terms with Plast USA.

Procedure

- Camp Leaders will be expected to read and sign the Plast USO Confidentiality Policy Certification at the beginning of each of their terms prior to gaining access to Confidential Information. In the case of Spec Tabory and Vyshkoly, this will occur prior to the start of each camp.
- The Appropriate Person will evaluate all positions inside of the camp and evaluate which individuals shall have access or be privy to any confidential information. This shall be reviewed and approved by the Leader of Camps and the Second Vice President – Programs.
- Employees will be expected to initially sign the Plast USO Confidentiality Policy Certification at the beginning of their employment prior to gaining access to Confidential Information. They will also be expected to sign the Agreement annually at the beginning of each fiscal year.
- Volunteers with access to confidential information will be expected to sign the Plast USO Confidentiality Policy Certification at the beginning of their experience with Plast USO, prior to gaining access to Confidential Information.
- Appropriate Person – will manage and retain these signed documents.
 - Regional Camps: Leader of OTK or his/her designee

- Specialty Camps: Leader of Camp or his/her designee
- Training Camps: Director of Training (on Board of Directors) or his/her designee
- This can be delegated, however accountability is with the Appropriate Person as listed above.
- National Board of Directors shall receive a copy of each signed confidentiality agreement.

Enforcement

- In the event an individual fails to submit a completed Agreement as required by this policy, that individual shall be advised that he or she is not in compliance with the Confidentiality Policy.
 - If a Camp Leader fails to comply prior to his or her first Committee Meeting, he or she will be advised by the Chair/Chief Corporate Officer that his or her participation in official Camp Organization activities is suspended until compliance with this policy is completed in a manner satisfactory to the Second Vice President - Programs.
 - In the event an individual fails to comply with this policy, including refusal or unwillingness to sign, without good cause for such delay being shown:
 - volunteers, if possible, will be moved into a role with no confidential information exposure, otherwise they may be terminated.
 - employee shall also be moved into a role with no exposure to confidential information, otherwise the employee may be terminated.

Determination of Whether a Breach of Confidentiality Exists

- If the Appropriate Person has reasonable cause to believe that a breach of confidentiality exists, the Appropriate Person shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged breach.
- If, after hearing the response of the individual and making such further investigation as may be warranted in the circumstances, the Appropriate Person determines that the individual has in fact breached confidentiality, appropriate disciplinary and corrective action shall be taken according to the current policies and procedures of the organization.

Termination

- At the end of a Camp Leader's term in office, when a volunteer leaves or upon the termination of an employee's employment, he or she shall return all documents, papers and other materials, regardless of medium, that may contain or be derived from Confidential Information in his or her possession. All keys, key cards and identification cards will be returned, and the individual's access to electronic information will be blocked.
- Because, Plast has a "bring your own technology policy" and as a result, all confidential information must be removed from personal electronic devices within four weeks of the end of the individual's term or employment. When the removal of confidential information from an individual's personal computing device, the individual must confirm this has been done and is completed via email to the Chair.

Approved by the Plast National Board of Directors on this 10th day of June, 2024

Plast Confidentiality Policy Certification

I have been given the opportunity to review the Plast USO Confidentiality Policy and understand how this applies to me. I have had the opportunity to ask questions regarding the policy and agree to abide by the policy.

Name Printed

Signature

Date

_____ Employee

_____ Volunteer