



Governance Policy: Access to Information and Privacy Policy

Policy Type: Governance

Date Approved: September 2009

Effective Date: September 2009

Date Revised: April 2019

Next Review Date: April 2022

General Principles and Purpose

The Friends of the Greenbelt Foundation and the Greenbelt Fund (Greenbelt) are arm's-length organizations managing their affairs independently of government. As such, they are not subject to provincial government regulations pertaining to information and privacy. However, as an institution that allocates public funds, we are committed to public transparency and accountability. We are equally committed to respecting and protecting the legitimate rights to the privacy of individuals and organizations with whom we work.

The *Greenbelt* adheres to the Personal Information Protection and Electronic Documents Act (PIPEDA) in relation to any commercial activities that it may undertake and otherwise works to conduct its operational activities consistent with privacy management best practices.

Access to Information and Privacy

Greenbelt

Members of the Board of Directors, Advisory Committee, and other Committees

Names will be provided with the main *Greenbelt* office address, telephone, and fax numbers. Personal and business addresses and telephone numbers will not be disclosed unless authorized by the individual concerned.

Staff

Names, titles, office and e-mail addresses, and office telephone and fax numbers will be provided. Personal addresses and telephone numbers will not be disclosed unless authorized.

Documents Created by the *Greenbelt*

All documents approved by the Board of Directors for public release will be made available. A list of information available to the public appears in Appendix A. The CEO and/or Chair of the Board should be consulted before draft documents are made available to individuals outside the *Greenbelt*.



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Applicants and Grantees

Applicants provide information to the *Greenbelt* about themselves, their past and future projects and their finances as part of each grant application. The data is reviewed in order to process and assess applications and for the distribution of grants. The data is made available to assessors for the purpose of this grant decision making.

The *Greenbelt* does not provide information about organizations applying for funding until a decision to fund has been made. After a funding decision has been made, the *Greenbelt* provides specific information to the public about the organizations it funds as per Appendix A, but will not provide detailed information on any applicants whether approved or declined for funding. Applicants may disclose this information if they wish, but the *Greenbelt* will treat it as confidential.

Unsuccessful Applicants

The *Greenbelt* will provide global information that will enable members of the public to understand how our funding is being allocated. However, the *Greenbelt* will not release information about specific organizations that were declined funding. These organizations may of course disclose the information themselves. The quality of our applications is high and the process is competitive. It can be assumed that applicants denied for funding did not meet the *Greenbelt's* program goals as thoroughly as those who were successful.

Grantees (Qualified and Non-Qualified)

Upon request, the *Greenbelt* normally will provide the name of funded organizations, including the name of a contact in the organization, telephone number, address, grant amount and duration, and a brief description of project/activity funded. If the funded organization requests the *Greenbelt* not to disclose certain information because to do so could put the organization or their clients at risk, the *Greenbelt* may choose to withhold that information.

Other Organizations

In order to carry out its mandate, the *Greenbelt* acquires information from various sources, including grant applicants, suppliers, government, public and private Greenbelts, and other charitable and non-profit organizations. Members of the public requesting information the *Greenbelt* has obtained from other organizations, which include, but are not limited to the above, normally will be directed to the original source of the information.



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Information Sharing

Consistent with its goals, the *Greenbelt* will promote collaboration by helping to coordinate the efforts of groups with an interest in *Greenbelt* activities and adopting a convening function to encourage and foster relationships among different organizations and communities. The *Greenbelt* may exchange information and analysis on a confidential basis with other funders, research institutions, and government departments when it is in the public interest to do so. For example, information could be exchanged to improve granting procedures, establish best practices, and encourage innovative cross-sectoral initiatives.

Special Requests

The *Greenbelt* is committed to responding promptly and fully to requests for information related to its operations and mandate. However, staff will not undertake additional research and analysis in order to respond to special requests for information unless there are clear public benefits that justify the time and expense.

Information Maintenance and Security

Access to confidential and personal information is limited to those whose work requires it. The *Greenbelt* ensures that financial and other records are maintained for as long as required by government regulations. An agreement with the Archives of Ontario may be established for procedures for disposing of material that ensures that documents of public value are stored. This is dependent on successful negotiations with the Archives.

Contact Lists

The *Greenbelt's* contact lists are only to be used for carrying out the ongoing business of the *Greenbelt* according to this Policy.



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Appendix A *Release of Information to the Public*

Information	Public Access	Conditions and Comments
Annual Report	x	Once approved by the Board of Directors and provided to Minister.
Policies	x	Once approved by the Board of Directors. The Board, Advisory and other Committees and associates are asked to sign the <i>Greenbelt's</i> Conflict of Interest and Code of Conduct Policy.
Program Guidelines	x	By individual request, posted on website and published in the Annual Report.
Audited Financial Statements	x	By individual request and on website.
News Releases	x	
General information about grants	x	By individual request, posted on website and published in the Annual Report.
Specialized information requiring additional research and analysis	x	Decided on a case-by-case basis taking into account the benefit to the public, cost and staff availability.
Grantees' organizational name, contact information, amount, purpose and description of the grant	x	A statement in relevant sections will inform the public that the information about grantees are valid as of the date the grant was approved. The <i>Greenbelt</i> will not be responsible for updating this information. Grantees will be informed that this information is normally made public on the website and in the Annual Report. They will be given an opportunity to request that it be kept confidential.
<i>Greenbelt</i> staff names, titles, office address, telephone, e-mail and fax information	x	
Name and term of Board members	x	
Minutes of Meetings of the <i>Greenbelt</i> Board of Directors and Board Committees	x	The Board of Directors approves Minutes of Board Meetings for public release.



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Appendix B

Policy on Greenbelt Contact Lists

Background

The *Greenbelt* maintains a number of contact lists in the course of its operations. Lists typically include names, addresses, telephone, e-mail details and other contact information. These include lists of:

- Grantee organizations
- Applicant organizations
- Government and Funder contacts
- Accounts Payable vendors
- Board Members
- *Greenbelt* volunteers
- Staff

Policy on Use of Contact Lists

The Policy on the use of contact lists is based on practices defined in PIPEDA, and the principle that the *Greenbelt* is required to protect the privacy of personal information in its possession. This Policy translates into the following practice:

The *Greenbelt's* contact lists are only to be used for carrying out the ongoing business of the *Greenbelt*. The CEO will authorize or delegate the use of such lists, in conducting such day-to-day business.

The CEO will not authorize use of the contact list for any purpose other than the ongoing business of the *Greenbelt*.

When the CEO deems that a request to use a contact list is not within the commonly understood definition of "ongoing business of the *Greenbelt*," they will turn the matter over to the Board of Directors for a decision. The Board of Directors will authorize use only if it is satisfied that the recommended use will support the objectives and business plan of the *Greenbelt*.