

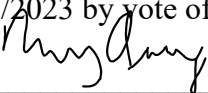
Community of Christ Onset Campgrounds

POLICY: Confidentiality Policy and Annual Statement

POLICY CATEGORY: Board – Ethics

DATE EFFECTIVE: 3/11/2023 by vote of the Onset Board of Trustees

APPROVED:



Missy Quay / Mission Center President



Jay Cook / Onset Board of Trustees Chair

This policy & attached statement supersedes the November 2, 2019 Annual Board Confidentiality Statement

PURPOSE:

To ensure that members of the Onset Campgrounds Board of Trustees and its committees understand and uphold their fiduciary duty to the Onset Conference and Onset Campgrounds by not disclosing any confidential information belonging to, or obtained through their position on, the Onset Board of Trustees and/or its committees unless authorized to do so, and by exercising good judgment and care, to avoid any unauthorized or inadvertent disclosures of confidential information.

This policy is intended to supplement but not replace any applicable state and federal laws governing confidentiality applicable to nonprofit and charitable organizations.

Definitions:

Fiduciary Responsibility: A duty to act on behalf of someone else, in this case, the Onset Campgrounds and Onset Conference, putting their interests ahead of one's own, with a duty to preserve good faith and trust. Being a fiduciary requires being bound both legally and ethically to act in the Campgrounds and Conference's best interests.

Confidential Information: "Confidential Information" means any information that is proprietary or unique to the organization, or which pertains to individual members of the organization, and that is disclosed by the organization to a person because of their role as a Trustee within the organization, and which would not otherwise be readily available to that person, other members of the organization who are not Trustees, nor to the general public. This includes information that must, by law, be kept confidential such as sensitive employment information, the results of background checks, and employee health records. This also includes individual campground residents' financial matters discussed during Executive Sessions, or which may be discussed during Charitable Concerns Committee, Financial Management Committee, or other Committee meetings. Discussion regarding alleged violations by

campground residents of the terms of their lease, OBOT policies, and/or campground regulations, as well as conflicts between residents that are brought to the Board, are considered confidential and must be discussed in Executive Session. However, the vote on any action to be taken must be done in open session. Finally, out of respect for stakeholders, information about anonymous donors must also be kept confidential.

Procedure:

1. As soon as practicable following Board elections each year, the Secretary shall send this policy and the Confidentiality Statement to all elected and *ex officio* Board members with instructions to read, sign, and return the signed statement prior to the appointment of Board Liaisons to committees.
2. Board Liaisons of committees that handle confidential information shall send this policy and the Confidentiality Statement to all committee members upon their seating on the committee, with instructions to read, sign and return prior to the first committee meeting.
3. The Board Secretary shall have custody of the signed copies of the Confidentiality Statements in accordance with any Records Retention Policy adopted by the Board.
4. Board members may not participate in Executive Sessions until their signed Confidentiality Statement has been returned. Committee chairs may exclude committee members who have not signed the Statement from specific discussions they deem to include confidential information until the committee member has signed and returned the Statement.

Balancing the need to be inclusive and transparent with the duty to keep information confidential:

In an effort to be inclusive of, and transparent to, its stakeholders, Section 5.9 of the Onset Board of Trustees Bylaws states that “All regular and special meetings of the Board shall be open to any member of the Onset Conference. [However], Executive Session (for Board members only) may be declared when sensitivity of an issue or individual privacy must be protected.” Board members must request that topics described in the definition of Confidential Information above are handled in accordance with this confidentiality policy.

Directors & Officers Coverage:

Directors and Officers insurance coverage is included in The Community of Christ’s insurance program, and campground board members are insured for their official actions as Board members, provided they are acting in their capacity as a Board member and their actions are legal, ethical, and in the best interests of the Onset Conference and the campgrounds, and the Community of Christ.

Annual Statements:

1. All members of the Onset Board of Trustees must read this policy and sign and return the Board-approved Confidentiality Statement each year no later than their first meeting after being elected.

2. All members of standing and ad hoc committees of the Onset Board of Trustees that handle sensitive / confidential information must read this policy and sign and return the Board-approved Confidentiality Statement as directed by the committee's Board Liaison.

Violations of Confidentiality Policy:

The Onset Board of Trustees will determine what action, if any, to take following a failure to exhibit professional behavior or appropriate fiduciary duty by one of its members, including unauthorized disclosure of confidential information. Actions may include, but are not limited to, a formal letter of reprimand, censure, request for resignation, or calling of a special meeting of the Onset Conference to request a recall of the trustee.

Approved: 3/11/2023

Reviewed:

Revised:

Superseded/Rescinded:

Community of Christ Onset Campgrounds Annual Confidentiality Statement

I, _____ am (check all that apply):
(printed name)

_____ **An elected or ex officio member of the Onset Board of Trustees**

_____ **A member of the following committee(s) of the Onset Board of Trustees:**

My signature below demonstrates that I have read the Onset Campgrounds Confidentiality Policy and that I agree to following:

- To uphold my fiduciary duty to the Conference and Campground by not disclosing any confidential information belonging to, or obtained through my position on, the Onset Board of Trustees or its committees to any person, including my relatives, friends, and business and professional associates, unless authorized to do so.
- To act in a professional manner, exercising good judgment and care, to avoid any unauthorized or inadvertent disclosures of confidential information, including refraining from leaving confidential information or documents where others might see them or gain access to them.
- If I am subpoenaed or otherwise legally requested to disclose any sensitive information to which I have had access due to my position as a Trustee or Committee Member, I will contact the Community of Christ Office of General Counsel. I understand that nothing in this statement is intended to prevent disclosure where disclosure is required by law.
- At the end of my term on the Board of Trustees or its committee(s) or upon my resignation or removal from the Board of Trustees or the Board's committees, my commitment to not disclose any confidential information obtained during my term on the Board and/or committee, verbally or in writing, continues in perpetuity. In addition, to the extent practicable, I will destroy or return to the Onset Board of Trustees any materials in my possession that contain, or are derived from, confidential information related to the work of the Onset Board of Trustees.
- If I fail to exhibit professional behavior or fiduciary duty, my fellow board members will determine the appropriate response, as outlined in the Policy.

Signature: _____ Date: _____