

**CONFIDENTIALITY AND CONFLICT OF INTEREST GUIDELINES – SUDBURY Rural
Community Immigration Pilot (RCIP) and Francophone Community Immigration Pilot
(FCIP) Programs**

CONFIDENTIALITY

1. Community Selection Committee (CSC) members shall:
 - (a) maintain the confidentiality of all discussions and decisions in which CSC members are involved, and any information, application materials, visual, digital, or other documentation that CSC members receive or to which they have access in their role as a CSC member and shall not disclose this information to anyone other than as may be authorized or required by the RCIP/FCIP, IRCC, legislation or an order of a court of competent jurisdiction;
 - (b) not disseminate, distribute, copy or otherwise reproduce employer, applicant, or program information in any manner or by any means;
 - (c) use confidential information solely for the purpose of serving in their role as a committee member, and not for any other purpose;
 - (d) securely maintain confidential information to protect it against loss, theft, unauthorized access, modification or destruction;
 - (e) avoid indiscreet disclosure about an applicant's affairs or application (i.e. comments, conversations, emails, texts, tweets, etc.);
 - (f) not access information about an applicant or the application program/process, either on their own behalf or on behalf of someone else, or by asking someone else to access it for them, unless the access is authorized by and for purpose of the RCIP and/or FCIP programs;
 - (g) not initiate or respond to any inquiry relating to the RCIP/FCIP unless they have prior written authorization from the Technical Coordinator(s) of Immigration Initiatives (RCIP/FCIP) and/or the Workforce Business Development Officer to do so, and promptly disclose to the Technical Coordinator(s) of Immigration Initiatives (RCIP/FCIP) and/or Business Development Officer for Workforce all such inquiries and any contact with any person or entity; and
 - (h) notify the Workforce Business Development Officer and/or Technical Coordinator(s) of Immigration Initiatives (RCIP/FCIP) immediately in the event of an alleged or an actual privacy breach.
2. Upon completion of each CSC meeting, CSC members shall:
 - (a) securely destroy all confidential information and any and all of the personal notes they recorded for use as a CSC member; and
 - (b) delete any and all information on their personal device(s) that they have downloaded. For clarification, "delete" includes moving the information to the "trash" and emptying the "trash".

3. A CSC member's obligation to maintain the confidentiality of information about the RCIP/FCIP and its applicants, survives the conclusion of their role as a CSC member. The duty of confidentiality also continues after an applicant is no longer an applicant to a program.
4. When, after reviewing this policy, a CSC member is in doubt about confidentiality in any circumstance, they should immediately refer their question(s) or concern(s) in writing to the Workforce Business Development Officer and/or Technical Coordinator(s) of Immigration Initiatives (RCIP/FCIP)

CONFLICT OF INTEREST

1. CSC members shall:
 - (a) not participate in recommendation decisions for RCIP/FCIP candidates or employers in which they have a known conflict of interest with, and it is their obligation as a committee member to declare a conflict, indicate the conflict and refrain from voting where the candidate or employer are:
 - (i) a friend or family member;
 - (ii) an employee in a business they own;
 - (iii) an employee in a business they manage;
 - (iv) an employee of an organization or corporation, for profit or not for profit, for which they sit as a member of its board; or
 - (v) a co-worker; or
 - (b) not accept form of payment (monetary or in-kind) in exchange for a recommendation or refusal of any application and shall disclose such offer or suggestion to the Business Development Officer and/or the Technical Coordinator(s) of Immigration Initiatives (RCIP/FCIP) immediately.
2. For further clarification, where a CSC member, either on their own behalf or while acting for, by, with or through another, has an interest, direct or indirect, in any applicant or employer, application or other matter being considered by the CSC, the CSC member shall:
 - (a) prior to any consideration of the matter, disclose the interest and the general nature thereof to the Business Development Officer and/or the Technical Coordinator(s) of Immigration Initiatives (RCIP/FCIP);
 - (b) not take part in the discussion of, or vote on any applicant, or question or recommendation in respect of the applicant or matter; and
 - (c) not attempt in any way whether before, during or after the meeting to influence the voting or recommendation on any such question or recommendation.