

NETWORK OF JEWISH HUMAN SERVICE AGENCIES, INC.

Confidentiality Policy

I. PURPOSE

Directors, officers, staff, and volunteers serving the Network of Jewish Human Service Agencies (the “Network”) will have access to information, including Confidential Information (as defined below), as a result of their positions with the Network. Respecting the privacy of its members, donors, staff, board deliberation and decision-making process, and the Network itself, is a basic value of the Network. The purpose of this Confidentiality Policy is to govern the actions individuals possessing confidential Network information and to protect the confidential nature of such information.

II. APPLICABILITY

This Policy applies to any person who is:

1. A director of the Network;
2. An officer of the Network;
3. A “key person” (as defined below) of the Network or any other person who exercises the powers of a trustee/director, officer or key person of the Network;
4. and any other employee, volunteer (including all Network committee members), independent contractor of, or substantial contributor to, the Network,

(each, a “Covered Person”).

This Policy applies to use and disclosure of all “Confidential Information”. Confidential Information means all non-public information entrusted to or obtained or learned by any Covered Person by reason of their position as a Covered Person.

The following are several non-exclusive examples of the types of confidential information subject to this policy:

a) Board and Committee Meetings:

- a. With respect to any vote of the Board, both the numbers of affirmative and negative votes and the individual votes of board members, unless specifically requested by a member to the contrary, shall be confidential but the record of individual votes shall be recorded and maintained with the records of the Network.
- b. No members of the Board, any committee thereof, or member of the Network staff may disclose to anyone other than other members of the Board or committee, or other staff members bound by this policy, the statements, positions, or votes by any board or

committee member on actions taken by the Board or any committee. Only in extraordinary situations will a Board or committee member disclose their position or vote on a Board or committee action (as distinguished from disclosure of the action taken itself), and only after advising the Chair before making such disclosure.

- c. The general “sense of the Board (or committee)” on a particular matter may be conveyed to an applicant, grantee, vendor or donor when the sharing of such information is helpful in conveying the Board’s (or committee’s) concerns. However, such information should only be shared with the concerned party. In addition, such information may be shared with a donor or with another grant maker when the information has been requested and is deemed relevant and important in helping the donor or grant maker arrive at an informed decision on a grant proposal or opportunity.
- b) Executive Sessions: The minutes of a Board meeting shall indicate when the Board goes into executive session but shall not normally reflect any of the topics or discussion that occurs in such session. However, when the Board takes an action in executive session that needs to be recorded, the Chair will provide any text that is to be included in the minutes of the meeting.
- c) Board and Committee Agendas: Agendas of the Board and committees should be treated as a confidential internal document restricted to use by Covered Persons. No portion of an agenda may be shared, in written or oral form, with any individual not a Covered Person or with any other organization (including any Network Member). Exceptions may be made only with the consent of the Chief Executive Officer or Chair.
- d) Personal Information on Staff, Board Members or Donors: Except as may otherwise be required by law, or as otherwise expressly approved by the individual involved, the home addresses, telephone numbers, fax numbers, email addresses, or other personal identification information of Board, committee and staff members, and of individuals at Member Agencies, are to be treated as confidential and not to be disclosed to other individuals or organizations.
- e) Information on Donors/Funders and Prospects: All non-public information obtained by Covered Persons regarding actual or prospective Network donors/funders will remain confidential and subject to this policy, and not disclosed to, or discussed with any other person except Covered Persons acting in their Network capacities, unless such disclosure is authorized by the donor/funder *and* the Chief Executive Officer or Chair have determined that such disclosure is not otherwise disadvantageous to the Network. All Covered Persons shall adhere to the principle that all donor/funder and prospect information created by, or on behalf of the Network is the property of the Network and shall not be transferred or utilized except on behalf of the Network.

III. Questions Regarding Application of this Policy

Any questions regarding the meaning or application of this policy should be directed to either the Chief Executive Officer or Chair of the Network:

Network of Jewish Human Service Agencies, Inc.
50 Eisenhower Drive, Suite 100

Paramus, NJ. 07652
Attention: Board Chair and Chief Executive Officer
Email: rrotman@networkjhsa.org and pohren@jfsdetroit.org

IV. COMPLIANCE

If the Board or Executive Committee has reasonable cause to believe that a Covered Person has failed to comply with this Policy, it may make such further investigation as may be warranted in the circumstances and if it determines that a Covered Person has failed to comply with this Policy, it shall take appropriate action which may include, in the case of directors and officers, seeking removal of the Covered Person from the board or from office or, in the case of key persons or others, termination of employment, committee membership or other affiliation with the Network.

V. POLICY ADOPTION AND OVERSIGHT

The Board is responsible for providing oversight of the adoption and implementation of, and compliance with this Policy.

This Confidentiality Policy was adopted by the Board on July 28, 2019.