



# POLICY MANUAL

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HAWKESBURY CENTRAL FOOD BANK

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# POLICIES

At every stage, the organization ensures that internal procedures are consistently aligned with expectations regarding governance and transparency, by promoting access to relevant documents for all stakeholders. The processes for updating, board approval, and incorporation into the policy manual are part of a commitment to ensuring consistency among the various policies and their practical application. This continuity in policy development and dissemination helps strengthen organizational accountability and ensure access to the necessary information, while laying the groundwork for the next steps in the continuous improvement process.

For reference, the policies included in this manual are numbered in accordance with Food Banks of Canada's standards of excellence and comply with that organization's requirements.

Approved by a resolution of the Board of Directors of the Hawkesbury Central Food Bank on May 8, 2026.

# Governance and administration

## 1.09 Risk Management

Risk management is essential to ensuring the sustainability and effectiveness of the Food Bank's operations. This process aims to identify, assess, and mitigate risks associated with all of the organization's activities, including the collection, storage, and distribution of food, volunteer management, and legal compliance.

- **Business Continuity Plan:** Establish measures to address unforeseen events (logistical disruptions, health crises, etc.). See the Continuity section for more details.
- **Risk Assessment:** Identify specific risks (e.g., food shortages, food safety, etc.) and develop measures to address them.

### a) Objectives of Risk Management

- Ensure food security for beneficiaries by guaranteeing the quality and safety of distributed food.
  - Prevent incidents or accidents that could endanger the health and safety of volunteers, beneficiaries, and other stakeholders.
  - Comply with applicable laws and regulations, particularly regarding food safety, data protection, and financial management.
  - Prepare the organization to respond to crises (supply disruptions, natural disasters, public health crises, etc.).
  - Ensure business continuity in the event of a major disruption or incident. However, a major problem could require the temporary closure of the facility. There are no sufficiently large premises available to immediately transfer equipment and food supplies.

### b) Risk Identification – Types of risks to identify:

- **Food-related risks:**
  - **Poor product quality:** Expired or improperly stored food.
  - **Food contamination:** Issues related to hygiene, food safety, or food handling.
  - **Stock shortages:** Insufficient donations or funding to meet beneficiaries' needs.
- **Operational risk:**
  - **Logistical problems:** Difficulties related to the transportation, storage, or distribution of food products.
  - **Equipment failure:** Breakdowns of refrigerators, storage equipment, vehicles, or other essential equipment.
  - **Regulatory non-compliance:** Failure to comply with laws regarding food safety, data protection, or donation management.

- **Human resources risk:**
  - o **Volunteer accidents or injuries:** Risks associated with physical labor during food collection, storage, or distribution.
- **Psychosocial risk:**
  - o Stress or distress among volunteers, particularly in a humanitarian context.
- **Financial risk:**
  - o **Theft or fraud:** Theft of funds, misappropriation of donations, mismanagement of finances.
  - o **Cash flow problems:** Insufficient funds to cover operations or raw material needs.
- **Reputational risk:**
  - o **Poor management of relationships with donors and beneficiaries:** Lack of transparency or poor communication.
  - o **Allegations of discrimination:** Lack of fairness or respect toward certain groups of beneficiaries.
- **Environmental risk:**
  - o **Natural disasters:** Floods, storms, or other events affecting inventory, logistics, or infrastructure.
  - o **Waste management issues:** Mismanagement of expired products or food waste.

#### c) Risk Assessment – Assessment Methods:

- **Impact and Probability:**
  - o **Impact:** Assess the potential consequences of a risk (on health, safety, reputation, the organization's sustainability, etc.).
  - o **Probability:** Estimate the likelihood that each risk will occur (low, medium, high).
- **Risk Matrix:** A matrix is used to rank risks by priority by combining impact and probability:
  - o **High Risk:** High impact, high probability (to be addressed as a priority).
  - o **Moderate risk:** Low to moderate impact, low to moderate probability (to be monitored).
  - o **Low risk:** Low impact, low probability (to be addressed if necessary).

#### d) Risk Mitigation Strategies

- **Food Risks:**
  - **Product Quality Control:** Implement rigorous controls at every stage of the collection, storage, and distribution chain. Regularly inspect products to verify their condition, labeling, and expiration dates.
  - **Inventory Management Plan:** Implement a FIFO (First In, First Out) system to prevent food waste. Maintain a regular and detailed inventory.
  - **Training for Staff and Volunteers:** Train all personnel on best practices for food safety and hygiene, particularly regarding the storage and handling of food.
- **Operational Risks:**
  - **Effective logistics planning:** Anticipate transportation and storage needs. Maintain a stock of backup vehicles and equipment to ensure business continuity in the event of a failure.
  - **Equipment inspection:** Implement a maintenance plan to ensure that equipment (refrigerators, vehicles, etc.) operates properly.
  - **Updating Procedures:** Define clear procedures for receiving donations, storing, and distributing products.
- **Human Risks:**
  - **Volunteer Insurance:** Purchase insurance covering accidents and injuries related to volunteer activities.
  - **Volunteer Well-being Management:** Create a positive work environment and prevent psychosocial risks by organizing opportunities for social interaction, recognition, and psychological support.
  - **Ongoing Training:** Provide volunteers with regular training on best practices and the specific risks associated with their tasks.
- **Financial Risks:**
  - **Regular Financial Audits:** Conduct internal and external audits to ensure transparency regarding funds raised and used.
  - **Internal Controls:** Implement strict financial control procedures, including cash balance checks, cash flow monitoring, and periodic financial reports.
  - **Diversification of Funding Sources:** Avoid relying on a single source of funding. Seek to diversify donations (individuals, businesses, grants).

- **Reputational Risks:**

- o **Transparent Communication:** Ensure regular and clear communication with stakeholders (donors, beneficiaries, media) regarding the Food Bank's activities.
- o **Adherence to Ethical Standards:** Implement a policy against discrimination, respect the dignity of beneficiaries, and ensure fair and non-stigmatizing distribution.
- o **Complaint Management:** Establish a complaint management system to respond quickly and effectively to the concerns of beneficiaries and volunteers.

- **Environmental Risks:**

- o **Natural Disaster Continuity Plan:** Establish emergency measures to protect inventory in the event of extreme weather events.
- o **Waste Management:** Implement recycling and food waste management systems in partnership with specialized companies.

#### **e) Risk Monitoring and Review**

- **Ongoing Monitoring:** Each department head (logistics, human resources, finance, etc.) must regularly assess risks in their area and report any new threats or mitigation opportunities.
- **Annual Review:** The risk management strategy must be reviewed annually to account for changes in internal and external risks, lessons learned, and regulatory changes.
- **Updating the Risk Management Plan:** An updated risk management plan will be communicated to all team members, volunteers, and partners so they are informed of new procedures and practices.

## **Conclusion**

Risk management is a dynamic process that is essential to the safety, sustainability, and effectiveness of the Food Bank's operations. By proactively identifying, assessing, and addressing risks, the organization can not only prevent potential threats but also strengthen the trust of donors, volunteers, and recipients, while maximizing its impact on the community.

## 1.10 Business Continuity and Disaster Response

HCFB is located in a sturdy, well-maintained municipal building equipped with a video surveillance system. The risk that a major disaster would prevent the organization from continuing its operations remains very low, except for the possibility of a prolonged power outage.

In the event of a major disaster, the plan agreed upon by the Executive Committee is as follows:

- HCFB will be temporarily closed until the facility is deemed fit to resume operations in accordance with organizational requirements.
- Announce the closure, as well as the future reopening, on the website and social media, specifying the estimated duration of the interruption, the reasons, and a contact person for any questions.
- Designate a person or team responsible for disposing of perishable products.
- The logistics team must dispose of perishable products. \*
- Before resuming service, staff will thoroughly clean and disinfect the premises, then prepare the shelves, refrigerators, and freezers for reopening.

**\* Note: Perishable goods will be disposed of in accordance with applicable health and environmental regulations.**

Additional measures may be implemented, depending on the circumstances and needs, in order to resume operations.

Although HCFB wishes to have a plan in place to ensure the continuation of its operations in the event of a disaster, the board of directors must acknowledge that there is no other location in Hawkesbury or the surrounding area that would allow for the continuity of its services if an event prevented the organization from operating normally.

An annual review of risks and solutions is conducted, taking into account additional suggestions and options that would offer the possibility of adopting new measures.

## 1.11 Conflicts of Interest

Potential conflicts of interest identified by the members of the HCFB Board of Directors are listed below.

However, if another conflict of interest not listed below arises, the Board members and the person involved in the conflict will conduct a comprehensive review of the situation to determine whether or not a conflict of interest exists. If so, the Board members will decide on the steps to be taken to resolve the situation based on the information gathered.

## **Article 34: VOTING AND CONFLICTS OF INTEREST**

Resolutions of the Board of Directors are adopted by a simple majority. Each director is entitled to one (1) vote and must cast it in person. In the event of a tie, the Chair has the casting vote.

A director who has a direct interest in a matter under consideration must abstain from voting. Subject to the conflict-of-interest policy, no member of the Board may, under penalty of removal from office, have any interest that creates a conflict between their personal or other interests and those of the Bank. Any director with a conflict of role or personal interest regarding a matter under discussion may participate in the information session on that matter but must withdraw during deliberations and voting.

### **Note:**

**A conflict could arise if the following policy were not followed (see text in italics below); however, the following policy is intended to prevent such a conflict:**

## **Article 26: COMPOSITION OF THE BOARD**

The Board of Directors shall consist of a minimum of five (5) and a maximum of nine (9) directors selected from among the members of the corporation, distributed as follows:

- Zero (0) to two (2) honorary members;
- Zero (0) to one (1) member representing the clientele.

### **Note:**

**No more than two (2) directors may come from the same organization, family, or social club.**

## **1.12 Privacy and Confidentiality**

### **Privacy and Access to Information Policies**

HCFB is committed to upholding the privacy and integrity of every individual.

### **A) Internal Privacy Protection - HCFB**

1. All personal information collected in the course of day-to-day activities, or collected in any other manner, as well as any other personal documents concerning employees, volunteers, and beneficiaries, must remain confidential.
2. Each beneficiary agrees to share their basic personal information for the purposes of file creation, management, statistics, and record-keeping.

### **Disclosure of Personal Information:**

Only basic information is required to become a beneficiary, such as:

First and last name, phone number, address, number of people in the household (adults and children)

## **Refusal to Disclose Information**

Basic information is essential to confirm beneficiaries' eligibility, but refusal to disclose additional information—such as salary, race, and religion—will not result in denial of services.

Volunteers receive training that clearly outlines beneficiaries' rights regarding the refusal to disclose information not essential to opening their case and for the purposes mentioned in item 2.

3. Any informal or public discussion regarding confidential information or information that identifies beneficiaries is prohibited. Confidential information may only be shared to resolve problematic situations, and only with staff members who are responsible for and authorized to make decisions regarding eligibility for services.

4. All volunteers, interns, and employees must sign the confidentiality agreement.

5. The policy regarding information collected electronically in connection with the website is available on the HCFB website.

## **B) Access to Information Policy**

Recipients' personal information must be available for them to review at any time until their file is closed—at which point it is destroyed—as well as whenever a recipient requests it.

## **C) Privacy and Personal Data Policy – Website**

The Hawkesbury Central Food Bank (HCFB) is committed to protecting the privacy of individuals who visit its website.

### **1. Collection of Information**

HCFB does not collect or store any personal data from users of its website.

### **2. Use of Cookies and Analytics Tools**

Cookies may be used for statistical purposes to analyze website traffic and usage, in particular through Google Analytics. The information collected is aggregated and does not allow for the individual identification of visitors. Users may, if they wish, disable cookies by adjusting their browser settings.

### **3. Indirect Collection During Donations and Links to Third Parties**

Data provided by users when making a donation is collected and processed by the external payment service provider, which is considered a third party. HCFB does not have access to this personal information. Users are encouraged to review the privacy policy of the relevant third party, accessible via the donation platform, for any questions regarding the handling of their personal information. Additionally, certain links on the website may redirect to external platforms, which have their own privacy policies.

### **4. Access and Disclosure**

No personal information is shared with third parties, as HCFB does not retain any.

## 5. Compliance

This policy complies with Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and Ontario's Freedom of Information and Protection of Privacy Act (FOIPPA).

## 6. Changes to the Policy

This policy may be amended at any time. The date of the last update will be posted on the website.

## 7. Contact Information

If you have any questions regarding this privacy policy, please contact HCFB at 613-636-0666.

# 1.13 Values

## Code of Ethics and Values

(Code of Ethics for Food Banks also included in Section 4.01; Customer Service)

This Code of Ethics and Values define the fundamental principles that guide our behavior, decisions, and actions within the food bank. We are committed to acting responsibly, respectfully, ethically, and transparently in all our activities, whether they involve collecting and managing food resources or interacting with our partners and beneficiaries.

- **Non-discrimination:** The food bank must ensure that resources are distributed fairly and without discrimination. The Code of Ethics is in place to uphold this principle.
- **Commitment to Solidarity:** Promote a culture of mutual aid and solidarity with people in need.
- **Data Protection:** Respect the confidentiality of beneficiaries and donors.

### a) Respect for Human Dignity

- **Principle:** We are committed to treating all people with dignity, respect, and fairness, regardless of gender, background, beliefs, age, social status, or disability.
- **Application:** Our actions, particularly during food distribution, must always preserve the dignity of recipients. Volunteers and staff must always act respectfully toward all individuals.

### b) Solidarity and Social Inclusion

- **Principle:** We believe in the importance of solidarity and social inclusion. The food bank exists to help people facing food insecurity, particularly those who are vulnerable and marginalized.
- **Implementation:** We make it a point of honor to provide assistance without discrimination and to create inclusive spaces for people from all communities and backgrounds. We encourage the active participation of recipients, whenever possible, in our initiatives.

### **c) Transparency and Accountability**

- **Principle:** We act transparently and with integrity, and we are accountable for the management of our resources.
- **Implementation:** We ensure that we provide clear and accessible information on the use of funds and food supplies, as well as on the results of our actions. We regularly publish financial and activity reports to ensure full transparency toward our donors, partners, and beneficiaries.

### **d) Integrity and Ethics in Resource Management**

- **Principle:** We manage all resources (financial, human, and food) with integrity, ensuring their optimal use and adherence to ethical principles.
- **Implementation:** We avoid any conflicts of interest, commit to complying with applicable laws and regulations, and manage donations and funds effectively. We also ensure the traceability of food products and their compliance with health and safety standards.

### **e) Commitment to the Environment**

- **Principle:** We are responsible for the environmental impact of our activities and strive to reduce our ecological footprint.
- **Implementation:** We prioritize sustainable practices, such as reducing food waste and managing waste responsibly. We also encourage efforts to reduce the carbon footprint of our operations, such as the collection, storage, and distribution of food.

### **f) Respect for Confidentiality and Personal Data**

- **Principle:** We respect the confidentiality of personal information belonging to beneficiaries, donors, partners, and volunteers.
- **Implementation:** Data collected as part of our activities (recipients' records, donor information, etc.) is handled confidentially and securely. We are committed to complying with laws regarding the protection of personal data.

### **g) Excellence and Efficiency**

- **Principle:** We constantly strive to improve our methods and achieve standards of excellence in our work to maximize the impact of our missions.
- **Application:** We implement regular evaluation processes for our work to identify areas for improvement and optimize our practices. We also promote ongoing training for our volunteers and staff to ensure high-quality service.

#### **h) Collaboration and Teamwork**

- **Principle:** We believe in the importance of collaboration among all members of the organization (staff, volunteers, partners) to fulfill our mission.
- **Application:** We encourage open communication, cooperation, and mutual respect within our organization. Teamwork is a fundamental pillar of the success of our collective mission.

#### **i) Social Responsibility and Community Engagement**

- **Principle:** We are committed to being a responsible member of the community and to supporting local initiatives aimed at combating poverty and social exclusion.
- **Implementation:** We collaborate with other civil society organizations, businesses, and public institutions to maximize our impact. We also seek to raise awareness and involve the community in our efforts (fundraisers, awareness events, etc.).

#### **j) Combating Fraud and Abuse**

- **Principle:** We are committed to preventing and combating all forms of fraud or abuse within the organization.
- **Implementation:** We have implemented strict procedures to prevent internal and external misconduct. Reporting of abuse or inappropriate behavior is encouraged, and corrective measures are taken to maintain the organization's integrity.

#### **k) Commitment of All Members**

This Code of Ethics and Values apply to all members of the food bank, whether they are volunteers, employees, or partners. Each individual is responsible for upholding these principles and actively contributing to their implementation. Any violation of this Code may result in disciplinary action, including termination of involvement with the organization.

### **Conclusion**

By signing this Code of Ethics and Values, each member of the food bank commits to upholding and promoting the principles that guide our work. We believe these values are essential to ensuring the sustainability of our mission and strengthening the trust of beneficiaries, donors, and the community.

#### **Signature**

The Code of Ethics and Values must be signed by all members of the organization upon joining (employees, volunteers, etc.) to ensure that they are familiar with the principles and commit to upholding them.

## 1.14 Equity, Diversity, and Inclusion (EDI) Policy

The organization is committed to promoting, developing, and strengthening a culture of equity, diversity, and inclusion (EDI) at all levels of its operations. To this end, the following process is in place:

- An annual consultation involving staff members, board members, volunteers, and stakeholders to identify EDI-related needs, barriers, and opportunities.
- The development of concrete and measurable EDI objectives, presented to the board of directors for approval.
- The integration of these objectives into the organization's strategic plan and policy manual.
- The implementation of ongoing EDI training activities for all staff, board members, and volunteers.
- Regular monitoring, including the collection of anonymized data and periodic evaluations to measure progress.
- An annual report on the state of EDI, presented to the board of directors and shared internally as well as with stakeholders.

An annual review of the process to adjust it based on recommendations arising from consultations and the analysis of results.

This policy aims to ensure that the organization fosters an inclusive and respectful environment that promotes the full participation of everyone, regardless of background, identity, culture, or experience.

# Human Resources

## 2.01 Human Resources Management Policy

Hawkesbury Central Food Bank (HCFB)

### 1. Purpose

The purpose of this policy is to define HCFB's human resources management practices to ensure fair management that complies with applicable laws and is aligned with the organization's mission.

### 2. Scope

This policy applies to all current and future paid staff of HCFB, as well as to members of the Executive Committee (EC) and the Board of Directors (BD) involved in human resources decision-making processes.

### 3. Legal Compliance

HCFB complies with all applicable provincial and federal laws, particularly those regarding employment standards, health, safety, and compensation.

### 4. Responsibilities

- Executive Board (EB): responsible for the day-to-day management of human resources, including hiring, staff monitoring, evaluation, and supervision.
- Board of Directors (BD): approves the EB's recommendations for hiring a new paid staff member and ratifies major decisions regarding human resources.
- External Consultants:
  - o Employment Services Center: Assists HCFB with the recruitment process (posting job openings, searching for candidates, conducting preliminary evaluations, and organizing initial interviews).
  - o MNP (accounting firms and consultants): Provides financial and administrative advice as needed.

### 5. Recruitment and Hiring

- The recruitment process is conducted by the Employment Services Center, in collaboration with the Executive Committee.
- The Executive Committee oversees the final interviews and recommends the hire to the Board of Directors for approval.
- Compensation terms are established based on the provincial salary scales suggested by the Employment Services Center and then approved by the Executive Committee.

## **6. Orientation and Integration**

The EC is responsible for welcoming, orienting, and integrating new paid employees to help them adapt to HCFB's practices, values, and internal policies.

## **7. Management and Supervision**

The EC supervises the work of paid staff, provides regular guidance, and ensures that employees have the support and resources necessary to perform their duties.

## **8. Performance Evaluation**

- The Executive Committee (EC) periodically conducts performance evaluations of paid employees.
- These evaluations serve to support professional development, recognize contributions, and identify areas for improvement.

Performance evaluations of senior staff members are conducted at least monthly by the Executive Committee (EC). These evaluations are conducted on an ongoing basis, in collaboration with the president, and focus in particular on the work of team leaders. Feedback is provided to ensure the smooth running of operations and, if necessary, to correct or improve certain aspects in consultation with the individuals concerned (team leaders or volunteers under their supervision).

## **9. Compensation**

- Salaries are determined according to applicable provincial pay scales, with adjustments proposed by the Executive Committee based on the position and the recommendations of the Employment Services Center.
- Any major changes or revisions to compensation are submitted to the Board of Directors for approval.

## **10. Policy Review**

This policy will be reviewed at least every five (5) years by the Executive Committee, in accordance with Food Banks Canada's requirements, or sooner, if necessary, due to legislative or organizational changes.

# **2.02 Policy on Violence and Harassment**

## **Objective**

This policy aims to ensure a safe, respectful, and inclusive environment for all HCFB members, volunteers, staff, beneficiaries, and visitors. No violent, intimidating, or harassing behavior, in any form, is tolerated on our premises or during our activities.

## **Definition of Violence and Harassment**

- Violence: any action, word, or behavior that may harm, intimidate, or threaten another person.
- Harassment: any abusive conduct, remarks, or repeated behavior that has the effect of undermining a person's dignity or psychological or physical integrity.

## **Intervention Procedure**

- If a service recipient behaves aggressively toward a volunteer, the volunteer should try to calmly address that person's questions and needs by providing information or explanations in order to resolve the situation peacefully.
- If the person continues to be aggressive, yells, or uses abusive language, the volunteer must request the assistance of a team leader or a committee member (if no team leader is available).
- The supervisor will, in turn, attempt to answer the person's questions calmly and respectfully. The person will nevertheless be advised that if their behavior does not change, the police will be contacted.
- If, after these interventions, the person continues to behave in a violent, derogatory, or harassing manner, or if they make the volunteers feel uncomfortable, the police will be called immediately.

## **Protection of Volunteers and Staff**

We are committed to the safety and well-being of everyone involved with HCFB. No volunteer or staff member should be subjected to abuse, aggression, violence, or harassment while performing their duties.

## **Final Provisions**

Anyone who violates this policy may be denied access to HCFB's services and, in serious cases, reported to the appropriate authorities. HCFB is committed to providing support and assistance to anyone who has witnessed or been a victim of such incidents.

By adopting this policy, HCFB reaffirms its commitment to providing a healthy, supportive, and safe environment for everyone.

## **2.03 Complaints and Conflicts**

The organization is committed to providing a harmonious and respectful environment where complaints and conflicts involving staff members, volunteers, as well as clients, donors, and beneficiaries (both in the context of activities and outside the Board of Directors) are handled fairly, confidentially, and promptly.

### **Resolution Process:**

When a conflict or complaint arises internally

**Step 1 – Amicable Resolution:** When a dispute or conflict arises, the individuals involved are encouraged to first attempt to resolve the situation among themselves, in a spirit of open communication and mutual understanding.

**Step 2 – Involvement of the Team Leader or the Executive Committee:** If the problem persists or the situation is deemed serious, it is possible to request the intervention of the team leader and/or a member of the Executive Committee. These individuals may act as mediators, assess the situation, and assist the parties in finding an appropriate solution.

**Step 3 – Decision-Making:** Depending on the severity of the conflict and following an analysis of the situation, a decision will be made in consultation with the parties involved, in accordance with HCFB's internal policies. This decision may include, if necessary, a reorganization of work duties or a department transfer for one or both of the individuals involved.

If the conflict arises from a client, donor, or beneficiary.

**Step 1 –** The parties involved are encouraged to prioritize dialogue and seek an informal resolution through direct discussion with one another, while respecting each other.

**Step 2 –** If the situation cannot be resolved at this stage, the complaint must then be submitted in writing to the organization's executive board.

**Step 3 –** The executive board reviews the complaint objectively and impartially, taking into account the information provided and, if necessary, consulting with the parties involved.

The executive board will issue a reasoned decision as soon as possible—ideally within one week—and communicate it to all parties involved.

### **Follow-up and Support**

Management or the executive committee may conduct a follow-up to ensure the well-being of all those involved and the lasting resolution of the conflict.

Support options may be offered depending on the nature of the situation.

### **Confidentiality and Protection**

All actions taken in connection with a complaint or conflict will remain confidential.

No form of retaliation will be tolerated against anyone who has filed a complaint or participated in the resolution of a conflict.

### **Policies and Access**

The organization maintains a copy of this policy and the related conflict resolution procedures for handling complaints filed internally or by clients, donors, and beneficiaries.

All staff, volunteers, clients, donors, and beneficiaries may consult the conflict resolution policy and its procedures at any time; these are available from management or upon request.

This policy aims to ensure the fair, transparent, and accessible handling of any complaint or conflict, fostering a healthy and inclusive work and collaborative environment for all of the organization's stakeholders.

## 2.05 Volunteer Participation

### Volunteer Involvement

Volunteers play an essential role in the smooth operation of the Food Bank. Their commitment, time, and skills directly contribute to the organization's mission, which is to ensure access to food for people in precarious situations. The purpose of this model is to clarify volunteers' expectations, responsibilities, and commitments, while providing a supportive and ethical environment.

#### a) Objectives of Volunteer Involvement

Volunteer involvement aims to:

The involvement of volunteers aims to:

- **Support food collection and distribution** efforts in a way that is efficient, compassionate, and respectful of recipients.
- **Strengthen community solidarity** by involving citizens in concrete actions to support the most vulnerable.
- **Promote the integration of volunteers** through training and enriching experiences that connect them to the organization's mission.
- **Ensure transparent and ethical volunteer management** by providing clear coordination and regular feedback on their involvement.

#### b) Volunteer Recruitment

##### Recruitment Criteria:

- **Shared Values:** Volunteers must embrace the Food Bank's values, namely respect, solidarity, fairness, and community engagement.
- **Skills and Interests:** Depending on the Food Bank's specific needs (food drives, inventory management, distribution, communications, etc.), volunteers will be selected based on their skills, experience, or willingness to learn.
- **Commitment to confidentiality and ethical standards:** Volunteers agree to follow internal policies, respect the confidentiality of recipients, and not use their position for personal gain.

## **Recruitment Process:**

- **Application Form:** Candidates must complete a form detailing their skills, motivations, and availability.
- **Selection Interview:** An individual interview is conducted to assess the candidate's motivation and skills.
- **Background Check:** Depending on the tasks to be performed, a criminal background check may be conducted, particularly for those in direct contact with beneficiaries.
- **Written Commitment:** Upon acceptance, each volunteer signs a volunteer agreement formalizing their commitment to upholding the organization's values, internal rules, and procedures.

## **c) Volunteer Training and Support**

### **Initial Training:**

Before beginning their duties, volunteers must complete an introductory training session, which includes:

- **Introduction to the Food Bank:** Objectives, missions, values, and general operations.
- **Roles and responsibilities of volunteers:** Clarification of tasks and expectations.
- **Food safety training:** Best practices for hygiene and food handling.
- **Respecting beneficiary confidentiality:** Raising awareness about the protection of personal data and information regarding beneficiaries.

### **Continuing Education:**

Regular training sessions should be organized to:

- Keep staff up to date on new practices, laws, and regulations (e.g., food safety, fundraising laws, etc.).
- **Build skills:** For example, in inventory management, communication, or team management.

Volunteer Follow-Up and Support:

- **Regular Meetings:** Regular meetings or informal check-ins allow us to gather volunteers' feedback and identify their needs.
- **Volunteer Supervision and Management:** A volunteer manager or coordinator is appointed to supervise, guide, and provide day-to-day support.

## **d) Volunteer Roles and Responsibilities**

Volunteers can contribute to various areas of the organization. Here are some typical roles:

### **Donation Collection**

- **Preparing for collection events:** Assisting with organization and logistics (setup, signage, preparing materials).
- **Participating in on-site collections:** Welcoming and directing donors, collecting food or funds.
- **Communicating with the public:** Raising public awareness of the Food Bank's goals, distributing brochures or informational materials.

### **Inventory Management**

- **Receiving food products:** Verifying the quality and quantity of received products.
- **Food storage:** Organizing products in storage areas in accordance with health standards.
- **Product inventory:** Recording and tracking inventory levels.

### **Distribution to Recipients**

- **Preparing food baskets:** Assembling products based on recipients' needs.
- **On-site distribution:** Welcoming recipients, handing out food items, and ensuring respectful and discreet service.
- **Assisting with queue management:** Organizing recipients in an orderly and equitable manner.

### **Outreach and Communication**

- **Organizing outreach campaigns:** Assisting with the creation of content (posters, social media, events) to inform the public about the Food Bank's mission.
- **Managing relationships with donors and partners:** Assisting with relationship management and communicating specific needs.

## **e) Volunteer Commitment**

### **Duration of Commitment:**

Volunteers commit for a fixed period (e.g., a specific event, a specific collection or distribution period), or for an indefinite period depending on the volunteer's availability and willingness.

### **Availability and Scheduling:**

- Volunteers must indicate their availability so that the organization can assign them to specific tasks.
- A calendar of the Food Bank's events and activities is provided to volunteers to help them manage their time.

### **Ethical Responsibilities:**

Volunteers agree to adhere to the following rules of conduct:

- **Respect for Recipients:** Treat each recipient with dignity, respect, and discretion.
- **Confidentiality:** Do not disclose personal information about beneficiaries, donors, or the Food Bank's activities.
- **Ethical Conduct:** Adhere to the Food Bank's standards of conduct, particularly regarding non-discrimination, respect for diversity, and fairness.

## **f) Recognition and Appreciation of Volunteers**

### **Formal Recognition:**

- **Volunteer Certificate:** An official certificate may be issued to volunteers at the end of their assignment, attesting to their commitment.
- **Appreciation Events:** Events (dinners, appreciation evenings) may be organized to thank volunteers for their time and contribution.

### **Recognition of Experience:**

- **References and Recommendations:** The Food Bank can provide letters of recommendation for volunteers who wish to highlight their experience in other professional contexts.
- **Personal Development Opportunities:** Volunteers can benefit from training and transferable skills (project management, leadership, teamwork).

## **g) Policy on Withdrawal or Termination of Volunteer Assignments**

### **Withdrawal Procedure:**

- A volunteer may end their involvement at any time by notifying the volunteer coordinator within a reasonable timeframe (for example, two weeks in advance).
- An exit interview may be offered to gather feedback on their experience and improve the organization's practices.

### **Honoring Commitments:**

Even in the event of withdrawal, each volunteer is asked to respect the integrity of the organization and the confidentiality of information handled during their volunteer service.

# Finance and Legal

## 3.07 Investment Policy

In compliance with applicable Ontario laws and by-laws.

This policy aims to ensure prudent and responsible management of funds, prioritizing capital preservation, liquidity, and a reasonable return. Authorized investments are low risk, approved by the board of directors, and subject to periodic monitoring.

### 2. Funds Covered by This Policy

- Unused temporary surpluses.
- Reserve or stabilization funds.

### 3. Guiding Principles

- **Safety first:** avoid any loss of capital.
- **Liquidity:** be able to access funds quickly if necessary.
- **Simplicity:** invest in products that are easy to understand.
- **Social responsibility:** do not invest in sectors that conflict with our mission (tobacco, weapons, fossil fuels, etc.).

### 4. Permitted Investment Types

- Interest-bearing savings accounts.
- Insured Guaranteed Investment Certificates (GICs).
- Government or corporate bonds with high credit ratings.
- Balanced, low-fee mutual funds or ETFs, ideally ESG (responsible) funds.

### 5. Prohibited Investments

- Individual stocks.
- High-risk or speculative investments (cryptocurrencies, options, derivatives).
- Non-transparent or high-fee funds.

## 6. Roles and Responsibilities

- **Treasurer or finance committee** enforces the policy and reports to the Board of Directors.
- **Board of Directors:** Approves the policy and receives periodic reports.
- **External manager (if used):** Must strictly adhere to this policy.

## 7. Monitoring

- The investment portfolio is reviewed **at least once a year**.
- The policy is reviewed **annually**, or in the event of a significant change.

## 3.08 Signing Authority Policy

### Anti-Fraud Measures

The organization has a provision regarding signing authority incorporated into its administrative regulations and an official signing authority policy.

This provision specifies the individuals authorized to sign on behalf of the organization, the types of documents involved (financial, contractual, administrative), as well as the applicable limits and control mechanisms.

### Basic Rules

- **No single person should handle money alone** (e.g., cash receipts, payments).
- **Two people must approve significant payments** (e.g., over \$500).
- **No food may be taken for personal use** without authorization.
- **Donations received must be recorded** (whether in cash or food).
- **Expenses must be supported by an invoice or receipt.**
- **Food inventory** must be checked regularly (and recorded).
- **Volunteers and employees** must report any suspicious behavior.

## Responsibilities

- **The Board of Directors** ensures that this policy is followed.
- **The treasurer (or finance committee)** monitors transactions and accounts.
- **Volunteers and employees** must follow the rules and report any issues.

## If fraud is suspected

- Immediately notify a member of the Board of Directors.
- An investigation will be conducted.
- If fraud is confirmed: disciplinary action (e.g., expulsion, reporting to the police).

## 3.09 Data Protection

See Policy 1.12 (Privacy—Web Data Protection, Section C)

## 3.10 Canadian Anti-Spam Act

Compliance with the Canadian Anti-Spam Act (CASL)

The Hawkesbury Central Food Bank (HCFB) does not solicit donations via email, text message, or other electronic means. No mass electronic solicitation campaigns are conducted. HCFB communicates with its donors, partners, or volunteers solely within the context of existing relationships, for the purposes of follow-up, coordination, or providing information. As such, HCFB complies with the requirements of the Canadian Anti-Spam Act.

## 4.01 HCFB Code of Ethics – And Food Banks

### Code of Ethics and Values

This Code of Ethics and Values define the fundamental principles that guide our behavior, decisions, and actions within the food bank. We adhere to the Code of Ethics and Values for food banks and are committed to acting responsibly, respectfully, ethically, and transparently in all our activities, whether they involve collecting and managing food resources or interacting with our partners and beneficiaries.

- **Non-discrimination:** The food bank must ensure that resources are distributed fairly and without discrimination. A code of ethics may be implemented to uphold this principle.
- **Commitment to solidarity:** Promote a culture of mutual aid and solidarity with people in need.
- **Data protection:** Respect the confidentiality of beneficiaries and donors.

#### a) Respect for Human Dignity

- **Principle:** We are committed to treating all people with dignity, respect, and fairness, regardless of gender, origin, beliefs, age, social status, or disability.
- **Application:** Our actions, particularly during food distribution, must always preserve the dignity of recipients. Volunteers and staff must always act respectfully toward all individuals.

#### b) Solidarity and Social Inclusion

- **Principle:** We believe in the importance of solidarity and social inclusion. The food bank exists to help people facing food insecurity, particularly those who are vulnerable and marginalized.
- **Application:** We make it a point of honor to provide assistance without discrimination and to create inclusive spaces for people from all communities and backgrounds. We encourage the active participation of recipients, whenever possible, in our initiatives.

#### c) Transparency and Accountability

- **Principle:** We act transparently and with integrity, and we are accountable for the management of our resources.
- **Implementation:** We ensure that we provide clear and accessible information on the use of funds and food supplies, as well as on the results of our actions. We regularly publish financial and activity reports to ensure full transparency toward our donors, partners, and beneficiaries.

#### **d) Integrity and Ethics in Resource Management**

- **Principle:** We manage all resources (financial, human, and food) with integrity, ensuring their optimal use and adherence to ethical principles.
- **Implementation:** We avoid any conflicts of interest, commit to complying with applicable laws and regulations, and manage donations and funds effectively. We also ensure the traceability of food products and their compliance with health and safety standards.

#### **e) Commitment to the Environment**

- **Principle:** We are responsible for the environmental impact of our activities and strive to reduce our ecological footprint.
- **Implementation:** We prioritize sustainable practices, such as reducing food waste and managing waste responsibly. We also encourage efforts to reduce the carbon footprint of our operations, such as the collection, storage, and distribution of food.

#### **f) Respect for Confidentiality and Personal Data**

- **Principle:** We respect the confidentiality of personal information belonging to beneficiaries, donors, partners, and volunteers.
- **Implementation:** Data collected as part of our activities (recipients' records, donor information, etc.) is handled confidentially and securely. We are committed to complying with laws regarding the protection of personal data.

#### **g) Excellence and Efficiency**

- **Principle:** We constantly strive to improve our methods and achieve standards of excellence in our work to maximize the impact of our missions.
- **Application:** We implement regular evaluation processes for our work to identify areas for improvement and optimize our practices. We also promote ongoing training for our volunteers and staff to ensure high-quality service.

#### **h) Collaboration and Teamwork**

- **Principle:** We believe in the importance of collaboration among all members of the organization (employees, volunteers, partners) to fulfill our mission.
- **Application:** We encourage open communication, cooperation, and mutual respect within our organization. Teamwork is a fundamental pillar of the success of our collective mission.

## **l) Social Responsibility and Community Engagement**

- **Principle:** We are committed to being a responsible member of the community and to supporting local initiatives aimed at combating poverty and social exclusion.
- **Implementation:** We collaborate with other civil society organizations, businesses, and public institutions to maximize our impact. We also seek to raise awareness and involve the community in our activities (fundraisers, awareness events, etc.).

## **j) Combating Fraud and Abuse**

- **Principle:** We are committed to preventing and combating all forms of fraud or abuse within the organization.
- **Implementation:** We have implemented strict procedures to prevent internal and external misconduct. Reporting of abuse or inappropriate behavior is encouraged, and corrective measures are taken to maintain the organization's integrity.

## **k) Commitment of All Members**

This Code of Ethics and Values apply to all members of the food bank, whether they are volunteers, employees, or partners. Each individual is responsible for upholding these principles and actively contributing to their implementation. Any violation of this Code may result in disciplinary action, including termination of involvement with the organization.

## **Conclusion**

I propose that by signing this Code of Ethics and Values, every member of the food bank commit to upholding and promoting the principles that guide our work. We believe these values are essential to ensuring the sustainability of our mission and strengthening the trust of beneficiaries, donors, and the community.

## **Signature**

The Code of Ethics and Values must be signed by all members of the organization upon joining (employees, volunteers, etc.) to ensure that they are familiar with the principles and commit to upholding them. The board may request that members reaffirm their commitment annually.

## 4.02 Complaints

### Customer Experience – Food Banks Canada

To file a complaint with the Hawkesbury Central Food Bank: See the policy and procedures outlined in Standard 2.03 of this manual.

To file a complaint with Food Banks Canada:

Would you like to submit a complaint or share your concerns with us?

The Hawkesbury Central Food Bank is committed to providing excellent service. Questions, concerns, and complaints are a reality, and we believe our stakeholders have the right to bring them to our attention.

To provide feedback, please contact Food Banks Canada's Customer Experience Helpline at 1-877-280-0329 or email [complaints@foodbankscanada.ca](mailto:complaints@foodbankscanada.ca).

#### **Contact Information:**

Food Banks Canada Customer Experience Helpline:

1-877-280-0329 or [complaints@foodbankscanada.ca](mailto:complaints@foodbankscanada.ca).

If you have any questions about the helpline, its availability, or the process to follow, please contact Chantal Senecal, Director of National Programs, at [chantal.senecal@foodbankscanada.ca](mailto:chantal.senecal@foodbankscanada.ca).

For any questions regarding specific complaints or the handling and follow-up of complaints, please contact Jaclyn Beaulieu, Network Services Coordinator, at [jaclyn.beaulieu@foodbankscanada.ca](mailto:jaclyn.beaulieu@foodbankscanada.ca)

## 4.04 Accessibility – Disabilities

### Accessibility Policy for People with Disabilities

#### 1. Objective

This policy aims to ensure that the Hawkesbury Central Food Bank (HCFB) provides equitable, accessible, and respectful service to people with disabilities, in compliance with applicable laws regarding human rights, employment, and health and safety.

#### 2. Physical Accessibility

HCFB's main entrance is at street level, with no stairs, allowing easy access for people with limited mobility, and the doors are automatic. However, if additional assistance is required, staff and volunteers are required to provide assistance to anyone in need.

#### 3. Welcome and Support

We are committed to welcoming people with disabilities with respect. Staff and volunteers are encouraged to:

- Offer help with navigation, reading, or understanding documents, as needed.
- Adapt communication to the person's abilities (e.g., speak more slowly, explain things differently).
- Provide physical assistance if requested or clearly needed.

#### 4. Internal Orders and Deliveries

When we are informed that a recipient needs assistance upon arrival, this information is communicated verbally or noted on their order. This allows the person responsible for internal delivery to bring the bags outside or to the car, as appropriate.

#### 5. Commitment to Continuous Improvement

HCFB welcomes suggestions aimed at improving the accessibility of its services. Any concerns or special requests may be brought to the attention of management or a staff member on site.

## 4.05 Access to Free Food

#### Objective

The purpose of this policy is to reaffirm HCFB's commitment to providing equitable and unconditional access to free food for individuals and families experiencing food insecurity.

#### Principle

HCFB recognizes that access to basic, healthy, and dignified food is a fundamental right. Therefore, all basic food services offered by HCFB are provided free of charge, without any conditions being imposed or suggested in exchange.

## **Eligibility Requirements**

Access to food provided by HCFB is in no way contingent on:

- Participation in volunteer activities;
- Donations, whether in cash or in kind;
- Participation in employability programs, training programs, or any other personal or professional development activities;
- Membership in any group, belief system, or ideology.

However, as part of its intake process, HCFB requires proof of residence to confirm the territorial eligibility of those it serves. No other requirements are imposed.

### **1. Communication**

This policy is publicly posted at HCFB's facilities and on its official communication channels. Staff and volunteers are trained on its contents and must ensure that it is followed at all times.

### **2. Review**

This policy is reviewed as needed or at least once every three years to ensure that it continues to reflect the principles of dignity, equity, and inclusion that guide HCFB's actions.

# Public Participation

## 5.01 Donor Requests

### POLICY – Respecting Donors' Communication Preferences

#### **Objective**

HCFB is committed to respecting the privacy, preferences, and wishes of donors regarding communications. This policy aims to guide our practices to ensure transparent, ethical, and respectful relationships with all those who choose to support our mission.

#### **HCFB's Commitments to Donors**

Donors have the right, at any time, to:

- Remain anonymous, both publicly and in our internal documents (unless required by law);
- Limit the frequency of communications, or choose the methods by which they wish to be contacted (e.g., email only, no phone calls, no printed materials, etc.);
- Refuse any further solicitations related to requests for donations, commitments, or participation;
- Opt out of all future communications upon request;
- Be informed about how their contact information is used and stored.

#### **Procedure**

Each donor's preferences are respected, and communications are tailored accordingly. Any request for withdrawal or modification is processed promptly by authorized staff.

#### **Confidentiality**

All donor data is treated confidentially, in accordance with our privacy policy.

#### **Review**

This policy is reviewed as needed or at least every three years.

## 5.02 List of Donors

### POLICY – Confidentiality and Non-Disclosure of Lists and Personal Information Hawkesbury Central Food Bank (HCFB)

#### **Purpose**

This policy aims to reaffirm HCFB's commitment to protecting the personal information of all individuals associated with the organization, including donors, members, volunteers, clients, and staff.

#### **Commitment to Confidentiality**

HCFB does not sell, rent, exchange, or share any lists of names or information regarding its donors, members, volunteers, employees, or the people it serves. No personal data or contact information is provided to third parties, whether for commercial, charitable, or other purposes.

#### **Protection of Information**

All information collected is used solely for the purposes for which it was provided, and is stored securely and confidentially, in accordance with applicable laws.

#### **No External Solicitations**

The contact information of donors or other individuals associated with HCFB is never shared for external solicitation purposes. Communications sent by HCFB are limited, respectful, and aligned with the preferences expressed by the individuals concerned.

**The following text is excerpted from the Governance Plan, Section 3: Code of Ethics and Values:**

#### **f) Respect for Confidentiality and Personal Data**

- **Principle:** We respect the confidentiality of the personal information of beneficiaries, donors, partners, and volunteers.
- **Implementation:** Data collected in the course of our activities (beneficiary records, donor information, etc.) is handled confidentially and securely. We are committed to complying with laws regarding the protection of personal data.

#### **Review**

This policy is reviewed as needed or at least once every three years to ensure its compliance with best practices in privacy protection.

## 5.03 Independent Advice

### Independent Advice for Certain Donations

#### **Purpose**

This policy aims to protect donors' interests by encouraging them to seek independent advice when they are considering making a donation that could have a significant impact on their personal circumstances.

#### **Guiding Principles**

HCFB encourages all donors to consult an independent advisor—legal, tax, or financial—in the following situations:

- If they are considering making a planned gift;
- If HCFB has reason to believe that the proposed gift is likely to significantly affect:
  - The donor's financial situation;
  - Their taxable income;
  - Or their relationships with family members.

#### **Role of HCFB**

HCFB does not provide any legal, tax, or financial advice. Its role is to respect the donor's wishes while ensuring that no inappropriate pressure, influence, or inducement is exerted during the donation process.

#### **Integrity and Respect**

This policy aims to preserve freedom of choice, transparency, and ethical standards in the relationship between the organization and donors.

#### **Review**

This policy is reviewed as needed or at least once every three years.

## 5.04 Donation Receipts

### POLICY – Issuance of Official Donation Receipts

#### **Objective**

This policy is intended to provide guidelines for the issuance of official donation receipts for tax purposes, in accordance with the requirements of the Canada Revenue Agency (CRA), and to inform donors of the applicable conditions.

#### **Issuance of Receipts**

HCFB is a registered charity and may issue official receipts for tax purposes. Receipts include all information required by the CRA, including the organization's legal name, registration number, the date and amount of the donation, and the donor's contact information.

#### **An official receipt is issued:**

- For any donation of \$3 or more;
- To anyone who requests one, unless they expressly indicate that they do not want one.

#### **Methods of Issuing Receipts**

- Receipts are handed out in person when a donation is made in person;
- By mail for donations sent by check;
- By email or through the online platform, depending on the third-party payment processor, for donations made online, if the donor requests it.

#### **Review**

This policy is reviewed as needed or at least once every three years to ensure compliance with CRA requirements.

# 5 Fundraising Practices

## Policy on Fundraising Practices

### Hawkesbury Central Food Bank (HCFB)

#### **Purpose**

This policy is intended to provide a framework for all fundraising activities—whether for food or financial contributions—undertaken by the Hawkesbury Central Food Bank (HCFB) or on its behalf, to ensure that they are conducted ethically, transparently, and in accordance with applicable standards for charitable organizations.

#### **1. General Principles**

All fundraising activities must:

- Be sincere, respectful, and free from any false or misleading statements.
- Accurately represent the activities of the HCFB and the objectives of the fundraiser.
- Clearly disclose the name of the organization (Hawkesbury Central Food Bank).
- Specify the intended use of the donations collected, namely direct support for food services for people experiencing food insecurity.
- Upon request, indicate whether the person soliciting donations is a volunteer, a staff member, or a contractor. Volunteers are usually identified by wearing a pin indicating their volunteer status.

#### **2. Food Drives**

Food drives can be organized:

- In partnership with supermarkets, businesses, schools, or at public events.
- By HCFB or in collaboration with recognized third-party partners.

#### **Collection Procedures:**

- Volunteers participating in these drives must be trained in food handling, including checking product quality (expiration dates, intact packaging, etc.).
- A written report must be prepared for each food drive, including:
  - The quantity of food collected (in kilograms).
  - The collection locations.
  - The names of partners or donors, when applicable.

### **3. Fundraising**

Fundraising includes:

- Online donations.
- One-time campaigns and recurring or ongoing campaigns, such as bingo games.
- Fundraising events (e.g., at retail stores, grocery stores, etc.).

#### **Transparency:**

- All fundraising efforts include clear communication about the intended use of the funds.

#### **Fund Tracking:**

- Funds raised are used exclusively for the purposes defined in each campaign.
- An annual financial report is produced by HCFB and made available to the public on our official website.

#### **Receipts and Tax Receipts:**

- An official tax receipt is issued upon request for any monetary donation of \$3 or more.
- During one-time events in public places (e.g., grocery stores), receipts may not be issued systematically. However, any donor may request an official receipt immediately upon making a donation.

### **4. Application**

This policy applies to:

- Any fundraising activity conducted by HCFB or on its behalf.
- Any fundraising conducted in person, online, or through partners.

HCFB is committed to upholding the principles of good governance, transparency, and integrity in the management of its fundraising activities, and to responding to any requests for information from the public in this regard.

## 5.07 Fundraiser Compensation

### Fundraiser Compensation Policy – HCFB

#### **Objective**

To ensure that all fundraising activities for the Hawkesbury Central Food Bank (HCFB) adhere to the highest ethical standards and are free from any financial conflict of interest.

#### **Principle**

Under no circumstances will HCFB compensate individuals or organizations that solicit donations or oversee fundraising activities based on the value of the donations received.

#### **Policy Statement**

No commission, bonus, percentage, or other form of compensation based on the amounts raised will be paid to any person or entity involved in fundraising for HCFB.

- No staff member, volunteer, consultant, or third-party organization will receive fees or performance-based payments related to fundraising.
- This policy applies to all fundraising campaigns, including those conducted by individuals, community groups, or partners.
- The only exception is standard service fees charged by:
  - Fundraising or social media platforms,
  - Payment processing services (e.g., credit cards),
  - Or other similar services, whose fees are calculated based on the value of transactions.

#### **Implementation**

Any agreement or collaboration related to a fundraising activity must be reviewed by management to ensure that it complies with this policy. In case of doubt, management will consult the board of directors.

#### **Revision**

This policy will be revised at least every two years or as soon as a legislative or regulatory change requires it.

## 5.08 Fundraising (Solicitation—Ethics)

### Policy on Ethical and Conduct Expectations When Soliciting Donations

#### Objective

To ensure that anyone who solicits or receives donations on behalf of the Hawkesbury Central Food Bank (HCFB) acts professionally, ethically, and in accordance with the law, while respecting the rights and trust of donors.

#### Scope

This policy applies to all staff members, volunteers, board members, partners, and contractors acting on behalf of HCFB in connection with fundraising activities or the receipt of donations.

#### Policy Statement

HCFB is committed to upholding the highest standards of ethical conduct in all its fundraising activities. To this end, anyone acting on behalf of the organization to solicit or receive donations must:

1. Act with fairness, integrity, and transparency at all times, and comply with all applicable laws, internal policies, and regulations.
2. Respect the wishes of potential donors: all communication will cease immediately if a person expresses a desire not to be contacted.
3. Disclose any actual or apparent conflict of interest to HCFB management without delay.
4. Refuse any donation intended for purposes incompatible with HCFB's mission, values, or activities.
5. Be able to confirm their official affiliation with HCFB, if necessary, by means of a letter, ID badge, or other valid form of identification.
6. Strictly protect donors' confidential information, including financial data (e.g., credit card numbers), in accordance with current security practices.
7. Implementation and Oversight: Anyone involved in fundraising will receive guidance on this policy.
  - HCFB management oversees fundraising activities and takes the necessary measures in the event of noncompliance.
  - Any incident or concerning behavior may be reported confidentially to management or the board of directors.

#### Revision

This policy is revised every two years or as needed to ensure compliance with current standards and laws.

## 5.09 Fundraising (includes details from 5.08)

### Donations and Fundraising Policy

#### A. Policy on Accepting Donations

##### **Objective**

To ensure that all donations received by HCFB support its mission, are safe, ethical, and comply with applicable standards.

##### Types of Donations Accepted

- Food donations: non-expired, fresh, and frozen food items that meet health standards.
- In-kind donations: clean clothing, small household items in good condition.
- Monetary donations: cash, checks, electronic transfers, or credit cards.

##### **Donations We Do Not Accept**

- Bulky furniture (beds, mattresses, sofas)
- Expired, damaged, or hazardous items
- Items that exceed our storage or handling capacity

##### **Principles**

HCFB reserves the right to refuse any donation without being required to provide a reason. Donations must be consistent with HCFB's values and mission.

##### **Food Drive Reports**

A written report is prepared for each food drive, including:

- The weight or quantity of food collected,
- The collection locations,
- The donors involved.

##### **Financial Report**

A detailed financial report on the total value of donations received—including monetary and in-kind donations—is prepared annually and published on the HCFB website to ensure transparency toward donors and the community.

## **B. Policy on Regulated and Designated Donations**

### **Designated Donations**

- Donations earmarked for a specific cause or program are accepted only if the designation is consistent with HCFB's priorities.

### **Rejection, Redirection, or Conditional Use of Donations**

If the intended use becomes impossible, or if the donation is not suitable for HCFB's mission or capabilities (e.g., insufficient space, inappropriate nature of the donation), HCFB may:

- Redistribute the donation to a partner organization,
- Or dispose of it safely, if the donation is not in usable condition or is deemed unsafe.

### **Regulated Donations**

- Strict compliance with the standards of Food Banks Canada, Feed Ontario, and applicable health regulations.
- Rigorous management of expiration dates, storage conditions, and specific regulations based on the type of donation.

### **Monetary Donations**

- Monetary donations are converted into food for recipients, in accordance with HCFB's core mission.
- An official tax receipt may be issued in accordance with Canada Revenue Agency guidelines.
- Financial management is transparent and accountable, with funds redirected to priority needs.

## **C. Naming and Endowment Policy**

### **Recognition**

- Official naming or acknowledgments based on the amount or nature of donations.
- Approval of recognitions by the Board of Directors.

### **Endowment**

- Management of long-term funds, bequests, trusts, or planned giving.
- Use of endowment income to support HCFB's activities and needs.

### **Review**

The policy is reviewed every five years to ensure its relevance and compliance with standards.

## 5.14 Client Dignity

### Objective

The Hawkesbury Central Food Bank (HCFB) is committed to providing its services with full respect for the dignity and rights of the people it serves. This policy aims to ensure that HCFB does not exploit any client and that it portrays clients respectfully in all internal and external communications, whether through illustrations, images, videos, or text. It also ensures that clients' needs and the resources required to meet them are represented fairly and honestly.

### Scope

This policy applies to:

- All HCFB employees
- All volunteers
- Members of the Board of Directors
- Partners and contractors involved in the production or distribution of content on behalf of HCFB

### Guiding Principles

- **Respect:** Communications must always reflect respect and compassion toward clients.
- **Non-exploitation:** No text, image, or other content may exploit a client's distress or vulnerability for sensationalist or commercial purposes.
- **Accuracy:** Clients' needs must be described realistically, without exaggeration or underestimation.
- **Informed Consent:** Any image or testimonial from a client must be used only with their written consent, after a clear explanation of the intended use.

### Practices and Requirements

- All public content (website, social media, reports, posters, videos, etc.) must be approved by senior management before publication.
- Images of clients must:
  - Be used only with signed consent.
  - Depict the person in a dignified and respectful manner.
  - Descriptive text must avoid stereotypes, prejudices, or negative language.
- Staff and volunteers receive sensitivity training on client dignity upon joining the organization.

### Review

This policy is reviewed at least every five (5) years, or sooner, if necessary, to ensure its relevance and compliance with the requirements of Food Banks Canada and Feed Ontario.

# Food Operations

## 6.01 Food Operations, Warehouse Safety

### Policy on the Safe Use of Equipment and the Transport of Food

#### Objective

This policy aims to establish safe practices regarding the use of material-handling equipment and the transportation of food at HCFB, in accordance with applicable laws and the food safety standards required by Food Banks Canada.

#### Scope

This policy applies to all staff, volunteers, and contractors involved in the handling, transportation, and storage of food intended for HCFB.

#### Safe Use of Equipment

- **Forklifts:** There are no forklifts on the HCFB premises.
- **Electric pallet jacks:** HCFB does not own any electric pallet jacks. The only pallet jacks used belong to external suppliers or distributors and are not operated by HCFB staff or volunteers.
- **Cold storage room:** HCFB does not have a cold storage room. Food is stored in refrigerators and freezers.
- **Shelves** are kept in very good condition and are never overloaded; they are installed on a firm, level surface inside a building owned by the Municipality of Hawkesbury. They do not block any passageways, doors, electrical panels, fire hoses, fire extinguishers, or any other emergency equipment.
- If structural damage were to occur, the shelf would be taken out of service immediately and eventually repaired by a professional to ensure proper functioning and safety.

#### Refrigerators and freezers:

- Temperatures are checked and recorded every morning and as needed throughout the day.
- The required temperature limits are: refrigerators at 4 °C or below, freezers at -18 °C or below.
- Freezers are defrosted immediately when ice builds up to ensure proper operation and a stable, adequate temperature; food is temporarily transferred to another freezer until the original freezer is back in operation and has reached the required temperature of -18 °C. The food is then returned to its original freezer. All transfers are recorded to track the location of the food during cold chain procedures.

## **Safe Food Transportation**

### **General Conditions**

- HCFB has a non-refrigerated truck for collecting food items.
- Double-lined insulated bags are available and used as needed to keep products fresh.

### **Transportation and Storage Timeframes**

- Suppliers are located about a five-minute drive from the facilities.
- Fresh, refrigerated, or frozen products must be refrigerated or frozen within **30 minutes of pickup**.
- In practice, products are generally stored immediately upon arrival, often within 30 minutes.

### **Communication with Suppliers**

- Suppliers and distributors notify HCFB as soon as fresh, refrigerated, or frozen products are ready for pickup.
- Pickup is scheduled to minimize the time products spend at room temperature.
- Risk Prevention
- Food is handled in a manner that prevents cross-contamination during loading, transport, and unloading.
- Transportation timelines and conditions are managed to limit the risk of bacterial growth and ensure food safety.

### **Policy Review**

- This policy will be reviewed at least every five years to ensure its relevance and compliance with current legal and regulatory requirements.

## 6.08 Risks – Environment, Facilities, and Equipment

### A) Cleaning and Disinfection Policy

#### Objective

- To ensure that all surfaces, work areas, and equipment used by HCFB are cleaned and disinfected on a regular basis and in accordance with food safety standards to prevent contamination.

#### Scope

- This policy applies to all staff and volunteers who handle, store, or distribute food at HCFB.

#### Guidelines

- **Cleaning:** Remove dirt, debris, and residue with soap and water or detergent from all food-contact surfaces, shelves, tables, desks, counters, floors, and bathrooms.
- **Disinfection:** After cleaning, apply an approved disinfectant appropriate for each type of surface and specific needs, in accordance with standards.
- For transfer and repackaging operations, use a 5% diluted bleach solution (5% bleach to 95% water) according to Feed Ontario's guidelines.

#### Frequency:

- Daily (or more often as needed) for food-contact surfaces.
- Weekly (or more often as needed) for storage areas, restrooms, etc.

**Training:** Staff and volunteers receive training on the safe use of cleaning and disinfecting products.

**Procedure Reference:** Specific steps are outlined in the internal documents "Daily and Weekly Sanitation Procedures."

**Scheduled review:** Every 5 years or as needed

## B) Maintenance Policy

### Objective

To ensure that HCFB's equipment and facilities are maintained in good condition, are safe, and are functional in order to support the food distribution mission under sanitary conditions.

### Scope

This policy applies to the equipment and facilities used in HCFB's operations.

### Guidelines

- **Preventive Maintenance:** Regularly inspect and maintain equipment such as refrigerators, freezers, shelves, worktables, and small appliances.
- **Repairs:**
  - o Repairs related to the building's structure (plumbing, electrical, roofing) are coordinated by the Board of Directors with the City of Hawkesbury.
  - o Repairs or replacements of internal equipment (refrigerators, shelves, etc.) are also decided by the Board of Directors.
- **Record-keeping:** Maintain a log of maintenance and repairs performed.

### Responsibility

- The Board of Directors makes all decisions regarding repairs and maintenance, in coordination with the Town or internal service providers.
- Staff promptly report any defects to the Board of Directors.

**Scheduled Review:** Every 5 years or as needed

## C) Facility and Equipment Inspection Policy

### **Objective**

To regularly verify that HCFB's facilities and equipment are clean, safe, and in good working order.

### **Scope**

This policy covers internal inspections designed to ensure that the premises and equipment used in the handling and distribution of food comply with sanitation standards.

### **Guidelines**

- Weekly visual inspection of work areas, dry storage areas, and equipment (excluding the building's structure).
- Use of an internal checklist to record observations.
- Immediate reporting of any anomalies to the board of directors, which will take appropriate action.
- Inspection reports must be retained for at least 12 months.

### **Responsibility**

- Inspections are conducted by the food safety manager or a designated person.
- Corrective actions are decided by the board of directors.

**Scheduled Review:** Every 5 years or as needed

## 6.11 Operational Risks - Pest Control

The Town of Hawkesbury is responsible for maintenance and professional services. However, given the strict standards, HCFB maintains a tracking form that is kept up to date with all information regarding inspections, issues, actions taken, and results, including the dates for each entry. Daily visual inspections are not recorded if everything appears normal.

### **Pest Inspection (Daily)**

Conduct a visual inspection to identify any signs of insects, rodents, or other pests.

#### **Inspect:**

- Shelves and floors in and around storage areas
  - o Especially where grain, grain products, and flour are stored—at the back or between products
- Shelves are placed at least 4 inches (10 cm) from the wall to facilitate inspection along the back of the walls and underneath
- Equipment and tools in use
- All surfaces, including high ones such as refrigerators
- Corners and behind equipment
- Waste and recycling areas, both indoors and outdoors
- Areas where there are unemptied boxes

Pest control bait stations (for ants and mice) are located in multiple places and are checked and refilled approximately every 14 days during professional inspections.

## **Procedures:**

### **In the event of pests or signs of pests (insects, rodents, etc.)**

#### **\*\*\* Take immediate action \*\*\***

- Report any signs or the presence of pests to your supervisor.

If pests are present

#### **Option 1:** When possible, remove them immediately and safely

- o Record the date, details, actions taken, and results in the designated log

**Option 2:** Since HCFB operates in facilities owned and managed by the Municipality of Hawkesbury, request professional consultation from the person responsible for the City of Hawkesbury's facilities to conduct a thorough inspection or extermination as needed

- o Record the date, details, actions taken, and results in the designated log
- o Keep the log for at least one year
- o The professional's report is the property of the municipality, as it owns and manages our professional maintenance services

- Ensure there is no contamination of food, equipment, or surfaces that come into contact with food; if there is a possibility or suspicion of contamination, remove the products, package them securely separately, and dispose of them safely according to our procedures
- Thoroughly disinfect the areas with bleach (approximately 5% bleach, 95% water)

During periods when infestations are more likely to occur, a professional inspection is conducted approximately every 14 days. Pest control measures are taken immediately if there is any suspicion or evidence of pests, parasites, or insects.

This policy is reviewed by the board as needed.

## 6.12 Operational Risks - Allergens

### Management of Foods Containing Allergens Handling, Storage, Labeling, and Traceability

#### **Purpose**

To ensure food safety for HCFB beneficiaries by preventing cross-contamination and enabling full traceability of foods containing allergens.

#### **Scope**

This policy applies to all employees and volunteers who handle, store, or label food on HCFB premises.

#### **Guiding Principles**

- Compliance with the standards and guidelines of Food Banks Canada, Feed Ontario, and public health authorities.
- Strict adherence to best practices for handling and storage to prevent allergen-related risks.
- Maintenance of dated records to ensure product traceability.

#### **1. Handling and Storage**

- Foods containing allergens are placed on the bottom shelves to prevent contamination of products located above them.
- Non-allergenic foods are stored separately on the upper shelves.
- Whenever possible, separate units (refrigerators or freezers) are reserved for certain products:
  - o Dairy products are stored only with other dairy products.
  - o Eggs are stored separately from other foods.
  - o Raw meats (chicken, beef, pork, etc.) are separated by type and stored in appropriate containers.
- Allergenic foods must not be mixed with non-allergenic foods in the same container or storage area.

## **2. Labeling**

- All food received must be clearly labeled:
  - o Product name.
  - o Date received or expiration date (depending on the information available).
- Products received without a label or date are immediately identified using internal labels indicating the date received.
- Known allergens must be listed on the label if the information is not already present on the original packaging.

## **3. Traceability and Records**

- Each product receipt is recorded in a dated log, including:
  - o Date of receipt.
  - o Name of the supplier or donor.
  - o Product description.
  - o Storage location (refrigerator #, freezer #).
- Records are maintained in a manner that allows for tracing:
  - o The origin of a food item.
  - o The date and conditions of its storage.
  - o Its current location within the facility.
- The records are updated whenever a new shipment is received or a product is moved to another storage area.
- In the event of a product recall:
  - o The product is immediately removed from the shelves and set aside to prevent accidental redistribution.

We keep dated lists of customer appointments for future reference, and our customers' grocery lists are kept in their files. This tracking allows us to know who received what and to contact them, if possible, in the event of a recall.

- o Recall information may be published in various ways, such as internally, on social media, and on our website.

Further details are available in Section 6.14

## **Policy Review**

This policy will be reviewed at least every five years, or sooner if the standards of Food Banks Canada, Feed Ontario, or public health authorities are updated.

## **6.13 Operational Risks – Handling, Unpackaged Food**

### **Safe Food Handling**

Policy based on guidelines from Public Health Ontario and Food Banks Canada

Official source: Public Health Ontario – Food Safety Resources

<https://www.publichealthontario.ca/en/health-topics/food-safety>

#### **1. Objective**

To ensure that all food is handled, stored, and distributed safely to prevent contamination and protect the health of recipients.

#### **2. Responsibilities**

- Employees and volunteers: Follow safe food handling procedures at all times.
- Manager: Ensure that at least one trained individual (with a Safe Food Handler certificate or equivalent) is present during business hours.
- Trained individual: Supervise and support the on-site team to ensure compliance with standards.

#### **3. Training**

- At least one person certified in safe food handling must be present during operations.
- Acceptable training includes:
  - o Safe Food Handler (Ontario)
  - o Equivalent training offered by public health authorities or an accredited organization.
- Certificates must be current and displayed as required.
- A certified person must be present and supervise staff at all times while food is being handled.

#### **4. Personal Hygiene**

- Hand washing is mandatory:
  - Before handling food
- After touching trash, one's face, or hair, or after coughing or sneezing
- Hair must be tied back or covered (hairnet or cap)
- Clean gloves if required, changed regularly
- No jewelry on hands or wrists
- Wear a clean apron or work clothes reserved for work
- Do not handle food if you have an illness or injury that could cause contamination or cross-contamination.

#### **5. Prevention of Cross-Contamination**

- Separate raw and cooked foods
- Do not mix different types of food during handling and storage.
- The use of utensils and cutting boards is not applicable or rarely applicable at HCFB, but if needed, the handling, cleaning, and disinfection practices recommended by Public Health Ontario and Food Banks Canada are followed
- Clean and disinfect surfaces before and after each use (5% bleach + 95% water)
- Use clean, sealed containers for storage and place them on shelves corresponding to their level of contamination risk—for example, place meats on the bottom shelf or in a refrigerator or freezer strictly dedicated to a single type of food. Examples: a refrigerator strictly dedicated to milk, a freezer dedicated to meats, etc.
- Products containing allergens must be stored separately and labeled with the allergen name if the product is packaged;
  - For example, granola bars with nuts, etc.
    - If the packaging is not labeled, the product must be labeled with the allergen name.
  - Allergens such as dairy products are generally stored separately in refrigerators and freezers dedicated solely to them.

## 5. Disinfection

- **Surfaces:** Disinfected with a diluted bleach solution (5% bleach + 95% water, as recommended by Feed Ontario).
- **Utensils and tools:** HCFB does not process food, but if tool disinfection is required, follow Food Banks Canada's standards for three-step sink washing:
  - o **Washing:** hot soapy water
  - o **Rinsing:** clean water
    - **Disinfection:** water at the recommended temperature or an approved disinfectant solution
- Air-dry on a clean surface

## 6. Temperature Control

- Adherence to safe temperatures:
  - o Cold foods:  $\leq 4^{\circ}\text{C}$  ( $40^{\circ}\text{F}$ )
    - Hot foods:  $\geq 60^{\circ}\text{C}$  ( $140^{\circ}\text{F}$ )
- Regular use of a calibrated thermometer
- Maintaining a record of temperature fluctuations

## 8. Storage

- Label and date all products that are not labeled or dated
- Apply the "first in, first out" (FIFO) method
  - o **And:** When preparing an order, DO NOT TAKE ITEMS (from a shelf, refrigerator, or freezer) marked with an "X" in front of them, labeled "do not take," or marked with a tape or sign indicating they should not be taken. If you need one of these items, ask your team leader.
- Inspect regularly for signs of spoilage or infestation
- Store food 15 cm (6 in.) off the floor
- Keep shelves 10 cm (4 in.) away from walls

### **9. Disposal of Non-Compliant Products**

- Any product that is damaged, contaminated, expired, or improperly stored must be removed immediately and disposed of or composted in accordance with local regulations.

## **6.14 Operational Risks - Traceability and Recalls**

### **POLICY AND PROCEDURES – Control of Operational Risks, Traceability, and Recalls**

#### **Purpose**

This policy aims to ensure that HCFB has an effective system in place to:

- Track the origin and destination of food received and distributed (traceability);
- Immediately remove and isolate any product subject to a recall;
- Appropriately notify clients and partners when a recalled product has been distributed.

#### **Scope**

This policy applies to:

- All HCFB employees, volunteers, and managers;
- All food products received, stored, and distributed by HCFB, whether from purchases, large donations, or mixed donations.

#### **Principles**

Food safety and client health are top priorities. Product traceability is maintained for all food received, even when not required by regulation.

- Recalls are managed promptly, thoroughly, and with proper documentation.
- Information about recalls is communicated clearly and made accessible to clients and stakeholders.

## PROCEDURES

### Traceability

- Record of Food Received
- For received products (purchases, large donations), a record is maintained indicating:
  - o Date of receipt
  - o Source (supplier name, or source: donor, collection, etc.)
  - o Quantity received by item type or category—weight
  - o Estimated value of donations
- For mixed donations
  - o Date of receipt
  - o Source (supplier, donor, collection, etc.)
  - o Quantity received by item type or category
  - o Estimated value of donations
  - o Total weight of donations

Records are retained for at least **one year**.

- **Distribution Log**

- Customers' grocery lists are kept in their files, along with the date of the visit.
- Dated lists of customer appointments are also kept.

This data makes it possible to track fairly accurately which customers received a product.

### Recall Management

- **Monitoring of Notices**

- o Designated staff regularly monitor (at least weekly):
  - ❑ Recall notices from the Canadian Food Inspection Agency (CFIA);
  - ❑ Communications from Food Banks Canada, Feed Ontario, and other partners as soon as they are received.

- **Identification of Affected Products**

- o Compare products subject to the recall with:
  - o Inventory in the warehouse and on the shelves;
  - o Records from the distribution center/warehouse.

- **Removal and Isolation**

- o Immediately remove any product subject to a recall from the shelves.
- o Clearly label and isolate them in a “recalled products—do not distribute” area.

- **Communication**

- o Disseminate information about the recall:
  - o Through internal postings;
  - o On the HCFB website and/or social media;
  - o Directly to customers identified in the registry, when possible.

- **Documentation**

- o Record each step of the recall in a registry:
  - o Date and time of the recall;
  - o Quantities withdrawn;
  - o Disposal method (e.g., destruction, return to supplier);
  - o Person responsible.

## **Training**

- All employees and volunteers receive training on:
  - o Traceability procedures;
  - o Steps to follow during a recall.

**Reminder:** Grocery store lists and customer appointment records help identify who has received a product. This data is updated with each visit.

## **Policy Review**

- This policy is reviewed at least every five years or sooner in the event of regulatory or organizational changes.

## 6.15 Operational Risks – Temperatures (Cold)

### POLICY AND PROCEDURES – Temperature Control and Monitoring Hawkesbury Central Food Bank (HCFB)

#### **Purpose**

To ensure that all products requiring refrigeration or freezing are received, handled, and stored under safe temperature conditions and verified using a calibrated thermometer, in accordance with food safety standards.

#### **Scope**

This policy applies to:

- All refrigerated or frozen food received by the HCFB;
- All refrigerators, freezers, and storage areas at the HCFB;
- All employees and volunteers responsible for receiving and storing food.

#### **PROCEDURES**

##### **Temperatures upon Receipt**

##### **1. Proximity and Speed**

- o Vendors are located approximately 5 minutes from the HCFB.
- o Products requiring refrigeration or freezing are picked up no later than 30 minutes after they are prepared at the vendor's location and are transported in insulated containers (boxes, coolers, or insulated bags) to maintain a safe temperature until they arrive at HCFB.
- o Upon arrival at the HCFB, the products are immediately placed in refrigerators or freezers.
- o The total time spent outside of refrigeration or freezing never exceeds 1 hour.
- o The distributors delivering their products have refrigerated vehicles, which significantly reduces the time spent outside of refrigerated or frozen storage areas.

##### **2. Inspection upon Receipt**

- o Refrigerated products must be at 4 °C or below.
- o Frozen products must be at -18 °C or below.
- o If a product exceeds these limits, it must be assessed and, if necessary, isolated and discarded.

## **Monitoring Storage Temperatures**

### **1. Daily Checks**

- The temperature of each refrigerator and freezer is checked every morning.
- If the equipment is used frequently during the day, the temperature may be checked again.

### **2. Log**

- Every morning, all refrigerators and freezers are checked to confirm that the temperature is safe.
- If all temperatures are normal, a single general note is entered in the log indicating that the daily check has been performed and that no anomalies were found.
- The log details only:
  - Temperatures recorded upon receipt of an order (including the vendor's name and date);
  - Temperature anomalies or exceedances and the corrective actions taken;
  - Temporary transfers of products (e.g., during cleaning or defrosting of an appliance), specifying:
    - The foods moved
    - The temporary destination
    - The return to the original appliance.

### **3. Corrective Actions**

- If the temperature exceeds safe limits:
  - Immediately transfer the products to another functional appliance;
  - Have the equipment repaired or replaced;
  - Assess the safety of the food and discard any items that pose a risk.

## **Training**

Managers in the distribution department and other responsible individuals or those in charge, as needed, receive training on:

- Safe temperature limits;
- The use and reading of thermometers;
- Maintaining temperature records.

## **Policy Review**

This policy is reviewed at least every five years or sooner if necessary.

## 6.18 Operational Risks – Staff Food Safety Practices

See Policy 6.13

## 6.19 Operational Risks – Staff Supervision

See Policy 6.13

## 6.21 Training and Certification – Food Handling

See Policy 6.13

## 6.22 Training and Certification – Operations Management

See Policy 6.13

**\* Note: Standards that do not require a policy have been intentionally excluded. \***