**Sample**

**Confidentiality Policy**

**Introduction**

This is the confidentiality policy of XXX.

XXX is aware of the importance of confidentiality and will ensure that all staff, volunteers and board members are aware of the Confidentiality Policy.

The Confidentiality Policy applies to all staff, volunteers and board members. Any information held by XXX will remain confidential within the organisation. This also applies to any information gained or learned in the course of an individual’s duties within the organisation.

XXX recognises that volunteers, staff members and board members gain information about individuals and organisations during the course of their work or activities. In most cases this information may not be stated as confidential and individuals may have to exercise common sense and discretion in identifying whether information is expected to be confidential.

1. **Responsibility**

The Chair of XXX is responsible for the organisation’s Confidentiality Policy.

1. **Breach of confidentiality**

No confidential issue is to be discussed with, or revealed to, any person or organisation outside the group/organisation except where the individual the issue relates to has given express permission. Staff and volunteers will avoid discussing any confidential issue unless it is directly relevant to their work.

Staff and volunteers should avoid exchanging personal information or comments (gossip) about individuals with whom they have a professional relationship. They should also avoid talking about organisations or individuals in social settings.

Any member of staff or volunteer found to have breached the Confidentiality Policy will become subject to the Disciplinary Grievance Procedure. Any board member who discloses information or knowledge gained at board meetings may be asked for their resignation.

In certain circumstances the organisation has a legal duty to disclose information to other agencies. These circumstances include Child Protection and Adult at Risk safeguarding issues and issues of financial management. If a situation occurs where confidentiality is legally required to be breached, the relevant parties will be informed of the action being taken.

Confidentiality can be breached unknowingly, for example, a telephone call may be overheard or a file may be left unattended on a desk so sensible precautions should be taken. Confidential telephone calls should be taken in a private place. Personnel files or other confidential documents will be stored in a locked filing cabinet which only authorised personnel have access to. Any confidential records stored on computer will be password protected. The organisation’s Data Protection Policy should be referred to for further details and also adhered to.

1. **Data Protection Act 2018 and General Data Protection Regulations**

XXX is committed to protecting the confidentiality of its users. The Data Protection Act and General Data Protection Regulations (GDPR) apply to anyone holding personal information about living individuals in both electronic and/or paper format. The following data protection principles for personal information handling must be followed - personal data must be:

* Processed lawfully, fairly and in a transparent manner
* Collected for specific, explicit and legitimate purposes
* Adequate, relevant and limited to what is necessary for the purposes it is being processed
* Accurate and kept up to date
* Kept in a form which permits identification of data subjects for no longer than necessary
* Processed in a matter that ensures appropriate security including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
* Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of data protection

Further information on the Data Protection Act and Regulation can be found [here.](https://ico.org.uk/)

1. **What information is held?**

XXX hold information on its users, volunteers and board members. This information is held with the permission of the individual.

Information held may include:
• Name and address details
• Details in volunteer application forms,
• Details in job application forms
• Medical information or records
• Other personal information.

From time to time information held may be in an area other than those listed above. This will be with the approval of the individual concerned.

1. **Storing information**

Confidential information will be stored on the computer in password-protected files or in a locked filing cabinet. Access will be restricted to authorised personnel only.

1. **Whistle blowing**

Where the Treasurer has concerns about the use of XXX funds, he or she may refer directly to the Chair or the Board outside the usual grievance procedure.

1. **Policy Review**

This policy will be reviewed on an annual basis unless we identify a need to review the policy earlier.

**Name of Policy/Procedure:** Confidentiality Policy

**Date of approval:**

**Approved by:**

**Review date:**

**Where filed:**

**Relevant related policies: Data Protection Policy and Safeguarding Children and Adults Policies**

**Any comments/instructions :**

**Amendments / Date:**

**Name of main author:**

***Note to the reader: This policy is for your guidance and does require amendments to meet the specific needs and activities of your organisation.***