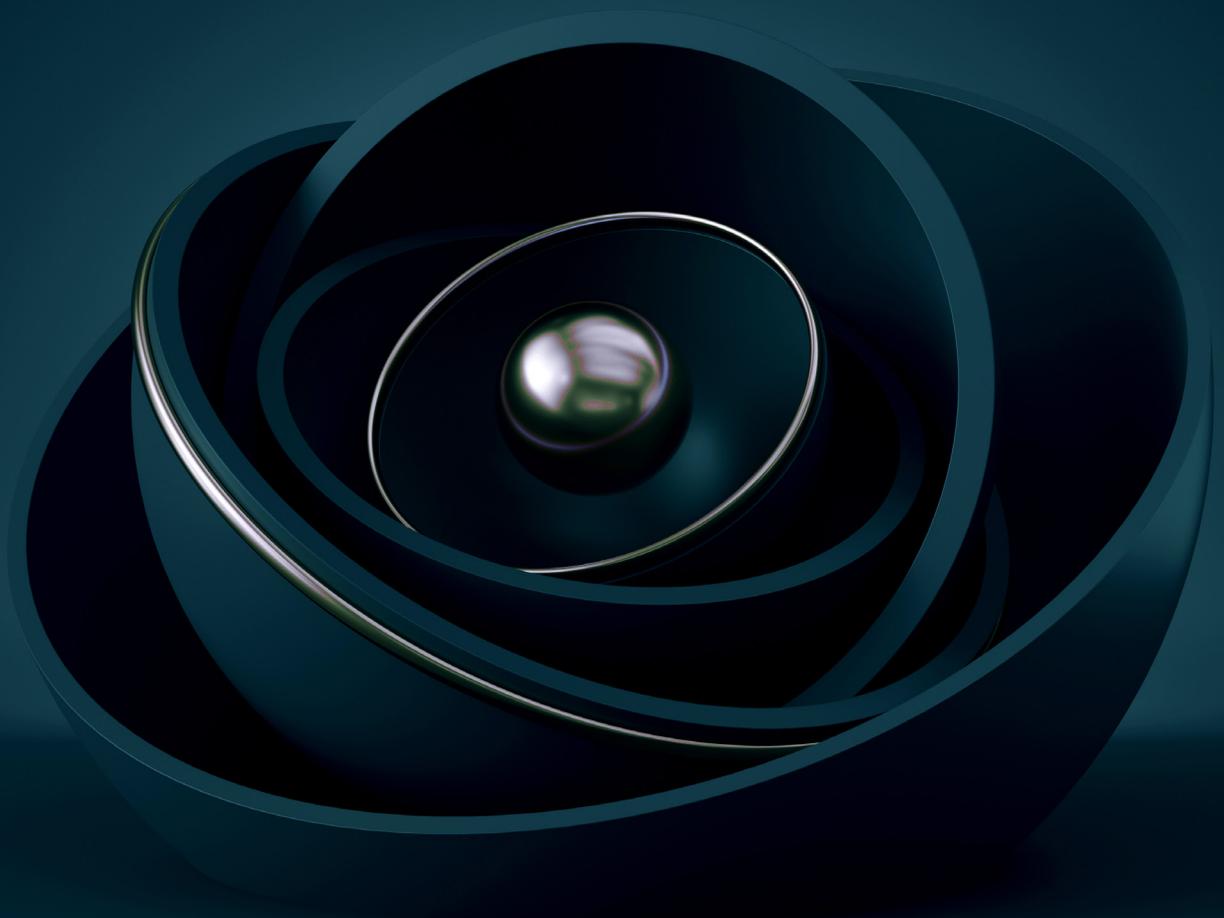




Confidentiality Policy



1 Introduction

- 1.1 This Confidentiality Policy ('this Policy') should be read in conjunction with the Charity's other internal policies. We keep certain types of information confidential for important reasons, including to comply with legal requirements.
- 1.2 This Policy applies to all trustees, staff, and volunteers of the Charity.
- 1.3 This Policy has been adopted by the Charity to:
 - 1.3.1 set best practice in protecting the interests of its members, donors and beneficiaries (together referred to as 'Members'), as well as its staff, volunteers and other stakeholders;
 - 1.3.2 ensure all Members have trust and confidence in the Charity;
 - 1.3.3 protect the Charity, its trustees, staff and volunteers; and
 - 1.3.4 assist in complying with data protection law.

2 Confidential Information

- 2.1 "Confidential Information" means any information that is not in the public domain and is intended to be protected from disclosure (whether it is proprietary in nature or whether by contract, legal protections or other means). Information may be confidential irrespective of whether it is specifically labelled as "confidential", "proprietary" or otherwise, or whether it is oral, written, drawn or stored electronically. The following types of information shall be considered confidential information; however, this is not intended to constitute an exhaustive list:
 - 2.1.1 information about the Charity, for example its plans and/or finances;
 - 2.1.2 information about individuals, for example the Charity's members, beneficiaries and donors;
 - 2.1.3 information about volunteers and staff; and
 - 2.1.4 information about other organisations.
- 2.2 Under no circumstances should trustees, staff and volunteers share any confidential information, including with their own partners, family or friends.

3 Maintaining Confidentiality

- 3.1 We limit disclosure of Confidential Information to the Charity's trustees, staff and volunteers.
- 3.2 You must treat all Confidential Information as strictly confidential. To maintain the confidentiality of Confidential Information, you must do the following:
 - 3.2.1 not access or use any Confidential Information to which you have not been provided access or authorisation to use;
 - 3.2.2 not disclose, publish, communicate, or make available Confidential Information to anyone that does not have the authority to know and use the Confidential Information, except as required to perform your duties or otherwise permitted by this Policy;
 - 3.2.3 if your duties require sharing Confidential Information with a third party, you shall not do so until the Charity and the third party have entered into a confidentiality agreement;
 - 3.2.4 not remove Confidential Information from the Charity's premises;
 - 3.2.5 not discuss Confidential Information in public where it may be overheard, including elevators, restaurants, cabs, and public transportation;

- 3.2.6 ensure visitors to the Charity's office and premises are accompanied by a member of staff at all times while in locations where Confidential Information might be accessible or become known;
 - 3.2.7 in the event of an inadvertent disclosure of Confidential Information, immediately inform the Charity's Data Protection Officer; and
 - 3.2.8 return any Confidential Information in your possession on termination of your employment and/or duties.
- 3.3 This Policy is not intended to restrict communications or actions that are protected or required by whistleblowing protection legislation such as the Public Interest Disclosure Act 1998, or otherwise disclosing information as permitted or required by law.
- 3.4 If you are unsure whether information should be kept confidential, check with Charity's Data Protection Officer before disclosing the information or taking any other action.

4 Compliance and other information

- 4.1 It is the responsibility of all staff and volunteers to ensure that any concerns arising from situations they observe, allegations (reports from third parties) or disclosures (reports from someone about themselves) relating to potential abuse or where an indictable offence may have been committed, are reported to their line manager even if they are unsure whether the concern is justified. It is not a breach of confidentiality to pass this concern on to an appropriate member of staff.
- 4.2 The trustees have overall responsibility for this Policy, but have delegated day-to-day responsibility for overseeing and implementing action to Charity's Data Protection Officer.
- 4.3 All trustees, staff and volunteers will have access to a copy of this Policy and training will be conducted as required. All trustees, staff and volunteers are therefore responsible for the success of this Policy and should ensure that they take the time to read and understand it. Questions regarding the content or application of this Policy should be directed to the Charity's Data Protection Officer

5 Monitoring

The Charity reserves the right to monitor, intercept and review, without further notice, trustees', staff and volunteers' activities using the Charity's IT resources and communications systems, including but not limited to social media postings and activities, for legitimate business purposes which include ascertaining and demonstrating that expected standards are being met by those using the systems and for the detection and investigation of unauthorised use of the systems (including where this is necessary to prevent or detect crime).

6 Breach of this policy

- 6.1 Breaches of confidentiality will be dealt with through the Charity's disciplinary procedures as appropriate. Non-adherence with this Policy will be considered a disciplinary matter.
- 6.2 You may be required to remove any social media content that the Charity considers to constitute a breach of this Policy. Failure to comply with such a request may in itself result in disciplinary action.

Effective from: 1 February 2022

Last reviewed by the Board: December 2021