

Confidentiality Policy and Procedure

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Audience:	ADCH Trustees and Volunteers		
Owner:	Secretary	Original Author:	Thérèse Carr & Debbie Smith
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1. Introduction

- 1.1** During the course of everyday working, ADCH staff and volunteers handle information, in both paper and electronic formats. Some of this is the personal data of staff, volunteers, Trustees, Members, donors and suppliers and is covered by our Data Protection Policy. Information about ADCH and its work is also sensitive and confidential and could, if disclosed, have adverse implications for the Charity.
- 1.2** ADCH aims to strike a balance between encouraging openness, avoiding unnecessary secrecy and bureaucracy, and ensuring individual privacy is respected. This Confidentiality Policy and the associated procedures as set out in 4.2 set the framework within which personal and any other potentially sensitive information is to be collected, stored, handled and disclosed.

2. Scope

- 2.1** This Policy is applicable to all members of staff, volunteers and trustees. If you are in any doubt about the application of this Policy, please seek guidance from your manager or the individual in charge of Data Protection compliance.
- 2.2** This policy is designed to support guidance on data protection and use of information technology. It should be read in conjunction with the Data Protection Policy, Information Security Policy and Information Access Policy as updated and amended from time to time.

3. Definition of Terms

- 3.1** Any reference to 'colleagues' 'staff' or 'employees' in this document includes employees, volunteers, and Trustees.
- 3.2** Any reference to 'work' includes voluntary roles.
- 3.3** Any reference to Data Protection Legislation means the Data Protection Act 2018, UK GDPR, Privacy and Electronic Communications Regulations and any other related legislation in force in the UK as updated or amended from time to time.

4. Policy Principles

4.1 Information to be kept Confidential

- 4.1.1** All personal data and confidential information about ADCH, our Members, and other third party organisations, must be kept and handled confidentially, whether the information has been received formally, informally or discovered by accident – anything seen or overheard accidentally pertaining to ADCH or an individual is still data covered by this Policy.
- 4.1.2** Broadly, this includes:
- Any information which relates to or is about an identified or identifiable individual i.e. their name linked with any other information about them (address, telephone number, etc);
 - Anything else provided to us in confidence by third parties and that is not a matter of public record; and
 - Sensitive organisational information that could be used to damage ADCH.

4.2 Handling Confidential Information

- 4.2.1** All personal data should be treated in the strictest confidence and in accordance with our Data Protection Policy. Personal data should only be disclosed outside the Charity in line with our Information Security Policy and Information Access Policy. The Information Access Policy sets out the procedure for dealing with requests from individuals for their own information.
- 4.2.2** Your work may bring you into contact with information that is personal to someone or organisational information that is not yet ready for distribution. Anyone worried or distressed by something they hear or read should seek guidance and support from their manager.
- 4.2.3** When handling personal data and other confidential information of ADCH, Members and other third-party organisations, always follow a few simple rules:
- Even in the most innocent of conversations, do not discuss any part of your work that could cause either an individual or ADCH embarrassment or harm;
 - Be aware of who else may be listening, particularly in areas open to the public;
 - Always lock your computer screen if you leave your desk unattended;
 - Never leave confidential information unattended and unsecured;
 - Do not read or process confidential documents on public transport or do so electronically using free public Wi-Fi;
 - Do not leave confidential documents unattended in cars or public places; and
 - Remember that information in the wrong hands can cause a lot of damage and unnecessary stress.

4.3 Access to Sensitive Information

- 4.3.1** Staff will generally have access to all information that they genuinely need to know to carry out their work and are under a duty to respect the confidentiality of all personal data held by ADCH.
- 4.3.2** Staff should have explained or made privacy information available to the individual to explain the purpose of recording the personal data, how that information will be used and whether it will be shared with any third parties when they collect the information. More information is available in our Data Protection Policy.

4.4 Access to Confidential Information

- 4.4.1** All employed staff, Trustees and volunteers must commit to this Confidentiality Policy before being given access to ADCH information assets. For paid staff, agreeing to confidentiality forms part of their contract of employment, which must be signed. For volunteers, it is covered by the ADCH Volunteer Confidentiality Pledge (see Appendix A), which all volunteers must sign.

4.5 Managing a Breach of Confidentiality

- 4.5.1** If accidental disclosure occurs, the responsible ADCH Manager should take swift action to minimise the damage. They should find out who knows about the incident, talk to them and remind them of their duty to maintain confidentiality.

4.5.2 The breach must be reported in line with ADCH's Information Breach Policy.

4.5.3 All staff should help to prevent accidental disclosures occurring by regularly pointing out that certain information is confidential and checking that people have understood, and reporting any information that they have access to but do not need for their work.

5. Monitoring and Review

5.1 The ongoing implementation of the Confidentiality Policy will be monitored through feedback from staff and volunteers.

5.2 This policy will be reviewed annually unless changing circumstances require an earlier review.

6. Consequences of Failing to Comply

6.1 Any breach of this policy is likely to constitute a serious disciplinary offence which could constitute gross misconduct for which the employee could be summarily dismissed i.e. dismissed without notice or pay in lieu of notice. For volunteers, this could lead to the termination of the Volunteer Agreement. Any breach could also cause serious damage to the reputation and standing of ADCH.

6.2 Where you know or suspect that a breach of this policy has occurred, whether deliberately or accidentally, you must inform a Manager or appointed ADCH contact. Any person found to have knowledge of a breach of this policy without reporting it shall be deemed to be in breach of this policy.

APPENDIX A

Volunteer Confidentiality Pledge

This form is an agreement for individuals volunteering for ADCH, outlining the requirement for the security and confidentiality of data and information relating to members, supporters, staff and volunteers and the work of ADCH.

During your period of volunteering with ADCH you may acquire or have access to personally identifiable and sensitive organisational information, which must not be disclosed to any other person, unless in pursuit of your duties. Confidential information includes all information relating to the work of ADCH and its members, supporters, staff and volunteers.

The Data Protection Act 2018 and other privacy UK laws that implement data protection (Data Protection Legislation) regulate the use of all personal data and includes electronic and paper records of identifiable members, supporters, staff and volunteers. ADCH is registered in accordance with the Data Protection Legislation. If you are found to have used or disclosed any information you have seen or heard whilst working within ADCH you may be dismissed from your volunteer role and possibly face legal action.

You must ensure that all records, including PC screens and computer printouts of registered data, are never left in such a manner that unauthorised persons can gain access to them. Paper records should always be locked away securely when not in use. PC screens must always be locked when left unattended and you must ensure you log out of computer systems when finished. All computer passwords must be kept confidential to yourself.

Declaration

I understand that I am bound by a duty of Confidentiality and I agree to adhere to the conditions in the Volunteering Agreement with ADCH by which I am engaged and also to my personal responsibilities to comply with the requirements of the Data Protection Legislation. I also agree to abide by the requirements set out within this document for the handling of ADCH's personal and confidential data.

Name of Individual (print name)	
Signature	
Date	

On behalf of ADCH

Volunteer Manager's Name:	
Job Title:	
Signature	
Date	

Version History

Version	Changes Made	Date	Made by
1	First Release	02/03/2021	ADCH
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