

The Positive Herd Project

Confidentiality Policy

Last review: 15/8/19

Next review due: 15/8/21

Introduction

The Positive Herd Project is aware of the importance of confidentiality and is committed to providing a confidential service to all who are involved. It is the responsibility of all board members, staff and volunteers to be aware of and adhere to the Confidentiality Policy.

For the purpose of this policy, confidentiality relates to the transmission of personal, sensitive or identifiable information about individuals or organisations which comes into the possession of The Positive Herd Project.

It is recognised that volunteers, staff members and board members gain information to potentially confidential information 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.

The Positive Herd holds personal data about its staff, volunteers and visitors, which will only be used for the purposes for which it was gathered and will not be disclosed to anyone outside of the organisation without prior permission. All personal data will be dealt with sensitively and in the strictest confidence internally and externally.

Breach of Confidentiality

No confidential issue is to be discussed with, or revealed to, any person or organisation outside the 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 refrain from discussing confidential information where members of the public or visitors are present. Confidentiality can be breached unknowingly so

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sensible precautions should be taken. Confidential telephone calls should be taken in a private place so as not to be overheard.

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.

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.

The Positive Herd Project's Data Protection Policy should be referred to for further details.

Legislative Framework

Data Protection Act 2018 and General Data Protection Regulations

The Positive Herd Project 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 manner 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

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Non-adherence

Any board member, employee or volunteer found to have breached the Confidentiality Policy will be dealt with in accordance with the Disciplinary Procedure.

Policy Review

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

Relevant related policies:

- Data Protection Policy
- Safeguarding Policy