

## CONFIDENTIALITY POLICY

The Diversity Trust, hereinafter referred to as ‘the organisation’, is committed to providing a confidential service to its stakeholders including Directors, Associates, volunteers, clients, partners and customers. No information given to the organisation will be shared with any other organisation, or individual, without the individuals expressed permission.

For the purpose of this policy, confidentiality relates to the transmission of personal, sensitive or identifiable information about individuals or organisations (confidential information), which comes into the possession of the organisation through its work.

The organisation holds personal data about its stakeholders etc. 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.

### Purpose

The purpose of the Confidentiality Policy is to ensure that all stakeholders understand the organisations requirements in relation to the disclosure of personal data and confidential information.

### Principles

- All personal paper-based and electronic data must be stored in accordance with the General Data Protection Regulations (GDPR) Regulation (EU) 2016/679 and must be secured against unauthorised access, accidental disclosure, loss or destruction.

- All personal paper-based and electronic data must only be accessible to those individuals authorised to have access.

## Statistical Recording

The organisation is committed to effective statistical recording of the use of its services in order to monitor usage and performance.

All statistical records given to third parties, such as to support funding applications or monitoring reports for a local authority shall be produced in anonymous form, so individuals cannot be recognised.

## Records

All records are kept in locked filing cabinets. All information relating to service users will be left in locked drawers. This includes notebooks, copies of correspondence and any other sources of information.

## Breaches of Confidentiality

The organisation recognises that occasions may arise where individuals feel they need to breach confidentiality. Confidential or sensitive information relating to an individual may be divulged where there is risk of danger to the individual, a volunteer or employee, or the public at large, or where it is against the law to withhold it. In these circumstances, information may be divulged to external agencies e.g. police or social services on a need-to-know basis.

Where an individual feels confidentiality should be breached the following steps will be taken:

- The individual should raise the matter immediately with their Line Manager.

- The individual must discuss with the Line Manager the issues involved in the case and explain why they feel confidentiality should be breached and what would be achieved by breaching confidentiality. The Line Manager should take a written note of this discussion.
- The Line Manager is responsible for discussing with the individual what options are available in each set of circumstances.
- The Line Manager is responsible for making a decision on whether confidentiality should be breached. If the Line Manager decides that confidentiality is to be breached then they should take the following steps:

The Line Manager should contact the Chair in the first instance, or Vice Chair of the Board of Directors. The Manager should brief the Chair / Vice Chair on the full facts of the case, ensuring they do not breach confidentiality in doing so. The Line Manager should seek authorisation to breach confidentiality from the Chair / Vice Chair.

If the Chair / Vice Chair agrees to breach confidentiality, a full written report on the case should be made and any action agreed undertaken. The Line Manager is responsible for ensuring all activities are actioned.

If the Chair / Vice Chair does not agree to breach confidentiality then this is the final decision of The Diversity Trust.

## Legislative Framework

The organisation will monitor this policy to ensure it meets statutory and legal requirements including the General Data Protection Regulations (GDPR) Regulation (EU) 2016/679, Children's Act,

Rehabilitation of Offenders Act and Prevention of Terrorism Act.  
Training on the policy will include these aspects.

## Ensuring the Effectiveness of the Policy

All Board members will receive a copy of the Confidentiality Policy. Existing and new stakeholders (e.g. volunteers) will be introduced to the Confidentiality Policy via induction and training. The policy will be reviewed annually and amendments will be proposed and agreed by the Board of Directors.

## Non-Adherence

Breaches of this policy will be dealt with under the Grievance and / or Disciplinary Procedures as appropriate.

## Further Reading

Data Protection Policy

Grievance and Disciplinary Procedures

Safeguarding Children, Young People and At Risk Adults Policy