

NEWENT RECREATION GROUND TRUST

(Registered Charity No. 301585)

c/o Newent Town Council
Rear annexe, Newent Community Centre, Ross Road, Newent, GL18 1BD
Tel: 01531 820638, Email: townclerk@newenttowncouncil.gov.uk

Confidentiality Policy

1. General principles

- 1.1 **NEWENT RECREATION GROUND TRUST** recognises that colleagues (employees, volunteers, trustees, secondees and students) gain information about individuals and organisations during the course of their work or activities.

In most cases such information will not be stated as confidential and colleagues must exercise common sense and discretion in identifying whether this information should be communicated to others.

Information given in confidence must not be disclosed without consent unless there is a justifiable reason e.g. a requirement of law or there is an overriding public interest to do so.

- 1.2 Confidential information includes anything that contains the means to identify a person, e.g. name, address, post code, date of birth, National Insurance Number, passport and bank details.

It includes information about sexual life, beliefs, commission or alleged commission of offences and other sensitive personal information as defined by the Data Protection Act 2018 and related Acts.

It also includes information about organisations such as confidential business plans, financial information, contracts, trade secrets and procurement information.

- 1.3 Colleagues should seek advice from the Secretary to the Trust about confidentiality and sharing information as necessary
- 1.4 Colleagues will avoid exchanging personal information or comments about individuals with whom they have a professional relationship.
- 1.5 Talking about the private life of a colleague is to be avoided at all times, unless the colleague in question has instigated the conversation.

- 1.1. Colleagues will avoid discussing confidential information about organisations or individuals in social settings.
- 1.2. Colleagues will not disclose to anyone, other than their line manager, any information considered sensitive, personal, financial or private without the knowledge or consent of the individual, or an officer, in the case of an organisation.
- 1.3. Where there is a statutory duty on **NEWENT RECREATION GROUND TRUST** to disclose information, the person or people involved will usually be informed that disclosure has or will be made unless this would put at risk the safety of any individual or jeopardise a potential criminal investigation.

Details about disclosure of information and who has been informed will always be kept on record and stored securely with restricted access.

- 1.4. Confidential information will be stored securely. It will not be left on desks but locked away. On computer it will be stored in password protected folders.

2. Why information is held

- 2.1. Most information held by **NEWENT RECREATION GROUND TRUST** is related to trustees or services which support or fund them.
- 2.2. Information is kept to enable **NEWENT RECREATION GROUND TRUST** colleagues to understand the history and activities of individuals or organisations in order to deliver the most appropriate services.
- 2.3. **NEWENT RECREATION GROUND TRUST** has a role in putting people in touch with voluntary and community organisations and keeps contact details which are passed on to any enquirer, except where the group or organisation expressly requests that the details remain confidential.
- 2.4. Information about protected equality characteristics of users is kept for the purposes of monitoring our equal opportunities policy and also for reporting back to potential funders.

3. Access to information

- 3.1. Information is confidential to **NEWENT RECREATION GROUND TRUST** as an organisation and may be passed to Newent Town Council, colleagues, line managers or trustees on a need to know basis to ensure the best quality service for users.

- 3.2. Where information is sensitive, i.e. it involves disputes or legal issues, it will be confidential to the employee dealing with the case and their line manager.

Such information should be clearly labelled 'Confidential' and should state the names of the colleagues entitled to access the information and the name of any individual or group who may request access to the information.

- 3.3. Colleagues will not withhold information from their line manager unless it is purely personal.

- 3.4. Users may have sight of **NEWENT RECREATION GROUND TRUST** records held in their name or that of their organisation.

The request must be in writing to the Secretary to the Trust giving 14 days' notice and be signed by the individual, or in the case of an organisation's records, by the Secretary to the Trust.

Sensitive information as outlined in para 3.2 will only be made available to the person or organisation named on the file.

- 3.5. Employees may have sight of their personnel records by giving 14 days' notice in writing to the Secretary of the Trust.

- 3.6. When photocopying or working on confidential documents, colleagues should ensure people passing do not see them. This also applies to information on computer screens.

4. Storing information

- 4.1. General non-confidential information about organisations is kept in unlocked filing cabinets and in computer files with open access to all **NEWENT RECREATION GROUND TRUST** colleagues.

- 4.2. Personnel information on employees, volunteers, students and other individuals working within **NEWENT RECREATION GROUND TRUST** will be kept in lockable filing cabinets.

- 4.3. Files or filing cabinet drawers bearing confidential information should be labelled 'confidential'.

- 4.4. In an emergency situation, the Secretary to the Trust may authorise access to files by other people.

5. Duty to disclose information

- 5.1. There is a legal duty to disclose some information including:
 - 5.1.1. Child and vulnerable adult abuse will be reported to the relevant statutory services
 - 5.1.2. Drug trafficking, money laundering or acts of terrorism will be disclosed to the police.
- 5.2. In addition colleagues believing an illegal act has taken place, or that a user is at risk of harming themselves or others, must report this to the Secretary to the Trust who will report it to the appropriate authorities.
- 5.3. Users should be informed of this disclosure unless this would put at risk the safety of any individual or jeopardise a potential criminal investigation. Details about disclosure of information and who has been informed will always be kept on record and stored securely with restricted access

6. Data Protection Act

- 6.1. Information about individuals, whether on computer or on paper, falls within the scope of the Data Protection Act 2018 and must comply with the data protection principles. These are that personal data must be:
 - Obtained and processed fairly and lawfully.
 - Held only for specified lawful purposes.
 - Adequate, relevant and not excessive.
 - Accurate and where necessary kept up to date.
 - Not kept longer than necessary, for the purpose(s) it is used
 - Processed in accordance with the rights of the data subject under the Act.
 - Appropriate technical and organisational measures are to be taken to guard against loss or destruction of, or damage to, personal data
 - Not transferred to countries outside the European Economic Area without an adequate level of protection in place.

7. Breach of confidentiality

- 7.1. Misuse of personal data and security incidents must be reported to the Secretary of the Trust so that steps can be taken to rectify the problem and ensure that the same problem does not occur again.

This includes unauthorised access to person-identifiable information where a member of staff, or third party, does not have a need to know. It also includes incidents of information lying around in a public area, theft and loss of information

Implemented Date:

Review Date: