

CONFIDENTIALITY POLICY & PROCEDURE

This policy and procedure has been adopted by Saffron Walden Mencap Society through its Trustees Committee, which remains responsible for its review. Original signed version is kept at the SWMS Registered office.

Signed:

Name: Chair of Trustees

Date:

Record of review of this policy and procedure:-

Reviewed: March 2025

Next review: March 2027

CONFIDENTIALITY POLICY AND PROCEDURE

1. Purpose

Respecting the privacy of our members, staff, volunteers, and supporters is a basic value of Saffron Walden Mencap Society. Personal, financial, and photographic information is confidential and should not be disclosed or discussed with anyone without permission or authorisation from the Chair of Trustees. Care shall also be taken to ensure that unauthorised individuals do not overhear any discussion of confidential information and that documents containing confidential information are not left in the open or inadvertently shared.

This policy must be read in conjunction with Saffron Walden Mencap Society's Data Protection Policy, Privacy Notice, and Social Media Policy.

This policy applies to employees, volunteers, and sub-contractors, hereafter referred to as staff. It does not form part of the terms and conditions of employment and might be varied from time to time.

2. Scope

Unauthorised disclosure of confidential or privileged information, including photographic data, is a serious violation of this policy and will subject the person(s) who made the unauthorised disclosure to appropriate disciplinary action, which may result in the termination of their employment.

3. Your Responsibilities

You must contact your line manager or the Chair of Saffron Walden Mencap Society if you have any concerns that you have breached our confidentiality policy.

4. Confidentiality Procedures

4a. Personal Information

Personal information, whether in hard or soft copy form, for example, names and contact details of members and details of their needs, should only be accessed by staff to the extent necessary for the performance of their duties in working with Saffron Walden Mencap Society. All digital confidential documents, including those containing personal information, must be stored within Saffron Walden Mencap Society's Google Workspace account. Access to these digital documents will be restricted to necessary staff and trustees only. Personal information, whether in hard or soft copy form, should not be held by any staff member, save to the extent necessary for carrying out business or activities for Saffron Walden Mencap Society in a lawful, proper, and efficient manner. Personal information so held is the responsibility of the individual holding it. Personal information, whether in hard or soft copy form, should not be left unattended or visible in a public place when in use and must be stored securely when not in use. They should be stored in a place and manner such that they cannot be accidentally moved or mistakenly taken by others. Any loss of personal information or suspected loss of information, in whatever form, must be reported as soon as practicable to your Line Manager or in their absence the Chair of Saffron Walden Mencap Society. Any printed documents containing personal

information must be shredded when no longer needed or in accordance with our Data protection policy. Personal information, in whatever form, must not be disclosed to anyone outside save as referred to below.

4b. Financial Information

Financial information, whether in hard or soft copy form, should only be accessed by staff or Trustees to the extent necessary for the performance of their duties in working with Saffron Walden Mencap Society. All digital financial documents must be stored within Saffron Walden Mencap Society's Google Workspace account. Access to these digital documents will be restricted to necessary staff and trustees only. Financial information, whether in hard or soft copy form, should not be held by any staff member, save to the extent necessary for carrying out business or activities in a lawful, proper, and efficient manner. Financial information so held is the responsibility of the individual holding it. Financial information, whether in hard or soft copy form and wherever held, should not be left unattended when in use and must be stored securely when not in use. Any printed financial documents containing personal information must be shredded when no longer needed & in line with our Data Protection Policy.

Any loss of financial information, in whatever form, must be reported as soon as practicable to your Line Manager or the Chair of Saffron Walden Mencap Society. Financial information, in whatever form, must not be disclosed to anyone outside Saffron Walden Mencap Society save as referred to below.

4c. Sensitive Information

Sensitive information is any data that, due to its nature, requires increased protection. This includes personal information concerning health, finances, lifestyle or beliefs, as well as confidential business or safeguarding

information. Access to sensitive information is strictly controlled to prevent unauthorised disclosure.

Sensitive information, whether in hard or soft copy form, should only be accessed by staff to the extent necessary for the performance of their duties in working with Saffron Walden Mencap Society. All digital sensitive documents must be stored within Saffron Walden Mencap Society's Google Workspace account. Access to these digital documents will be restricted to necessary staff and trustees only. Sensitive information, whether in hard or soft copy form, should not be held by any staff member, save to the extent necessary for carrying out business or activities for Saffron Walden Mencap Society in a lawful, proper, and efficient manner. Sensitive information so held is the responsibility of the individual holding it. Sensitive information, whether in hard or soft copy form and wherever held, should not be left unattended or visible in a public place when in use and must be stored securely when not in use. Sensitive information should be stored in a place and manner such that this cannot be accidentally moved or mistakenly taken by others. Any loss of sensitive information, in whatever form, must be reported as soon as practicable to your Line Manager or the Chair of Saffron Walden Mencap Society.

Sensitive information, in whatever form, must not be disclosed to anyone outside of Saffron Walden Mencap Society save as referred to below. Any printed sensitive documents containing personal information must be shredded when no longer needed & in accordance with our Data Protection Policy. Personal information must not be disclosed outside of Saffron Walden Mencap Society unless those to whom it relates gives their consent for its use for the specific purpose concerned, or unless its disclosure is required by law or another regulatory requirement. Financial information must not be disclosed outside

Saffron Walden Mencap Society, without the consent of the Treasurer or the Chair of Trustees or as required by law or other regulatory requirements. Sensitive information must not be disclosed outside Saffron Walden Mencap Society unless those to whom it relates give their consent for the specific purpose concerned or its disclosure is required by law or other regulatory requirements and see further on sensitive information below.

4d. Sharing Sensitive Information

In the context of safeguarding children and safeguarding vulnerable adults from abuse, sensitive information may need to be shared as provided for in our Safeguarding Policies. Staff should refer to the relevant policy and procedure if they feel sensitive information needs to be shared in any given case. In any event, save in cases of emergency, staff must refer to the nominated Safeguarding Leads for guidance. To avoid casual disclosure of information, all staff/volunteers are required to take all reasonable measures to ensure that:

- when using any personal information, financial information, or sensitive information, in whatever form and in whatever circumstances, such information is not seen by any person who is not authorised to see it, and
- when discussing any personal information, financial information, or sensitive information, in whatever circumstances, such information is not heard by any person who is not authorised to hear it.

4e. Photographic Data

Photographs and videos containing images of individuals are considered personal data. Informed consent must be obtained before taking, using, or publishing photographs or videos, especially of children or vulnerable adults. Consent should specify the purpose of the photograph/video and how it will be used. Digital photographs and videos must be stored securely within the Saffron

Walden Mencap Society's Google Workspace account, with access restricted to authorised personnel. Photographs and videos should only be used for the purposes for which consent was given, and in accordance with Saffron Walden Mencap Society's Social Media Policy. Any printed photographs containing personal information must be shredded when no longer needed.

5. Return of all Documentary Information

All documentary information, whether in hard or soft copy form, including photographic data, given to or acquired or created by any staff member during and relating to their working with Saffron Walden Mencap Society must be returned to their Line Manager or the Chair of Saffron Walden Mencap Society at the end of the working relationship.

6. Staff process for breach of personal data

All breaches, however small, must be reported to the Chair of Saffron Walden Mencap Society. Please refer to section 3. All breaches will be recorded and/reported in line with Government Data Protection Regulations.