



**Country
Trust**

Where children
learn and grow

CONFIDENTIALITY POLICY

The Country Trust is a registered charity no. 1122103 and is a company limited by guarantee registered in England no. 6436266
Registered address and head office: Moulsham Mill, Parkway, Chelmsford, CM2 7PX
President: The Duke of Westminster

Policy Ref	CON
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INTRODUCTION

The Country Trust recognises the right of individuals to confidentiality and that they have a right to expect that personal details will be kept confidentially and in line with the requirements of law. The organisation recognises that misuse of data can be damaging and distressing and is committed to the principles of GDPR (General Data Protection Regulation) which provides individuals with protection from unwanted or harmful use of data.

All Country Trust staff including employees, self-employed contractors, volunteers and trustees are required to abide by this policy.

This policy should be read in conjunction with The Country Trust's Data Protection Policy.

SCOPE

This policy applies to the confidentiality of all employees, volunteers, potential employees and volunteers, ex-employees and volunteers, service users, customers, suppliers, donors, consultants, contractors and any other individual or organisation that has contact with The Country Trust directly or indirectly.

POLICY

The Country Trust believes that the right to privacy, confidentiality and appropriate use of data are essential to ensure that all individuals have full confidence in the organisation and are treated with respect and dignity.

Confidential information will be kept securely and access to data and premises controlled in accordance with the GDPR policy. Confidential paper information will be stored in locked cabinets.

Staff with access to confidential information are trained to ensure that they understand their obligations.

GENERAL PRINCIPLES

- Confidentiality applies to all facts or information about an individual including, but not exclusively, personal data and can also apply to expressed opinions.
- Facts and information about an individual will not be divulged or passed to a third party without the individual's recorded consent (unless an exception applies – see below)
- If the organisation is contacted by someone else on behalf of an individual, then we will only act on behalf of and/or share data with the individual's direct permission.
- An individual's approach is treated as being to the organisation, rather than the individual worker. As such discussion of issues relating to individuals within the organisation, on a 'need to know' basis, are permitted under this policy.
- Where consent is provided to share data, this will always be done using secure and confidential methods, either by post, or pass worded email.



EXCEPTIONS

It is recognised that there may be times when it is appropriate to breach confidentiality for legitimate reasons without permission. The reasons permitted under this policy are:

- If there is, or suspected to be, an immediate risk to life or a risk of serious harm
- When a safeguarding allegation or concern has been raised
- If the organisation has a legal obligation to disclose particular information
- If an allegation is made against the organisation that requires external investigation

The decision to breach confidentiality in these circumstances may be taken by the Chief Executive or in her absence the Chairman of Trustees.

BREACHES OF CONFIDENTIALITY

All employees and volunteers will be made aware of this policy and of their right to invoke the Grievance Procedure if they believe information is divulged without their consent.

All other individuals will be made aware of this policy and of their right to invoke the Complaints procedure if they believe information is divulged without their consent.

The organisation takes allegations of a breach of this policy seriously and will follow the Disciplinary procedure to investigate and deal with such allegations.

Data Breach and procedures forms part of The Country Trust's Data Protection policy. Data breach procedures are published on SharePoint and The Country Trust's website.

POLICY DATE

This policy was agreed and disseminated on Wednesday 25th March 2020.

Signed on behalf of The Country Trust on 25th March 2020

Jill Attenborough
Chief Executive