



St Andrew's Club
Confidentiality Policy for staff and volunteers
June 2020

1. General principles

- 1.1. St Andrew's Club recognises that employees, volunteers, trustees and students use information about individuals and organisations during the course of their work or activities. In most cases information will not be stated as confidential and it will be necessary to use common sense and discretion in deciding whether information is expected to be confidential. This policy aims to give guidance but if in doubt, seek advice from the Youth Club Manager.
- 1.2. Colleagues are able to share information with the Youth Club Manager where necessary to discuss issues and seek advice.
- 1.3. Colleagues should avoid exchanging personal information about individuals with whom they have a professional relationship.
- 1.5. Colleagues should avoid talking about individuals or organisations in social settings.
- 1.6. Colleagues will not disclose to anyone, other than the Youth Club Manager, any information considered sensitive without the knowledge or consent of the individual, or an officer in the case of an organisation.

Sensitive personal data under GDPR (see point 7 below) means data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

- 1.7. If it is necessary to discuss difficult situations with each other to gain a wider perspective on how to approach a problem, the individual's/ parent's/ carer's or organisation's consent must be sought before personal information enters into the discussion, unless it is beyond doubt that the individual/ parent/ carer/ organisation would not object to this. Alternatively, a discussion may take place without names or identifying information remaining confidential.
- 1.8. Where there is a legal duty to disclose information, the person to whom the confidentiality is owed will be informed that disclosure has or will be made.

2. Why information is held

- 2.1.** Information held by St Andrew's Club relates to individuals or organisations which support or fund the Club.
- 2.2.** Information held by St Andrew's Club relates to members for monitoring purposes, reporting back to funders, awareness of any health issues and to ensure an up-to-date emergency contact number is available.
- 2.3.** Information about ethnicity and disability of members is kept for the purposes of monitoring our equal opportunities policy and also for reporting back to funders. This information contains figures only, there are no distinguishing references such as name, location or age for example. It is entirely numerical.

3. Access to information

Please see St Andrew's Club Information Governance Policy

4. Storing information

Please see St Andrew's Club Information Governance Policy

5. Duty to disclose information

- 5.1.** There is a legal duty to disclose some information including:

- 5.1.1.** Child abuse will be reported to the Local Authority Child Protection Team.

- 5.1.2.** Drug trafficking, money laundering, acts of terrorism or treason will be disclosed to the police.

- 5.2.** In addition, if colleagues believe that an illegal act has taken place, or that a member is at risk of harming themselves or others, they must report this to the Youth Club Manager who will report it to the appropriate authorities.
- 5.3.** The member concerned should be informed of this disclosure.

6. Disclosures

- 6.1** When dealing with Disclosures and Disclosure information St Andrew's Club complies fully with the DBS Code of practice:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/474742/Code of Practice for Disclosure and Barring Service Nov 15.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/474742/Code_of_Practice_for_Disclosure_and_Barring_Service_Nov_15.pdf)

- 6.2** Disclosure information is kept separately from an applicant's personnel file in secure storage with access limited to those who are entitled to see it as part of their duties. It is a criminal offence to pass this information to anyone who is not entitled to receive it.
- 6.3** St Andrew's Club may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

7. General Data Protection Regulation - GDPR

- 7.1.** Information about individuals, whether on computer or on paper, falls within the scope of the GDPR and must comply with the principles. **Full details are in the Club's Information Governance Policy.**

8. Breach of confidentiality

- 8.1.** Employees who are dissatisfied with the conduct or actions of other colleagues should raise this with the Youth Club Manager using the grievance procedure, if necessary, and not discuss their dissatisfaction outside.
- 8.2.** Colleagues accessing unauthorised files or breaching confidentiality may face disciplinary action. Ex-employees breaching confidentiality may face legal action.

9. Whistleblowing

9.1. Where the Treasurer has concerns about the use of St Andrew's Club funds, he or she may refer directly to the Chair outside the usual grievance procedure (Please see separate **Whistleblowing Policy**).

10. Review

It is recommended that this policy is reviewed on an annual basis, in response to changes in relevant legislation, contractual arrangements, good practice or to an identified failing in its effectiveness.

Author: Annette Fettes, Chief Executive

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