

Confidentiality Policy

Our **company confidentiality policy** is to explain how we expect our employees to treat confidential information. Employees will unavoidably receive and handle personal and private information about members, volunteers, paid staff and our charity. We want to make sure that this information is well-protected.

We must protect this information for two reasons. It may:

- Be legally binding (e.g. sensitive customer data.)
- Constitute the backbone of our group

This policy affects all employees, including trustees, committee members, investors, members and volunteers, who may have access to confidential information.

Common examples of confidential information are:

- Unpublished financial information
- Data of members/ volunteers and staff
- Customer lists (existing and prospective)
- Data entrusted to our company by external parties
- Documents and processes explicitly marked as confidential

All our volunteers and staff have access to emergency contact details. Our administrator has access to our full members database.

Where and how is our data stored:

- We lock or secure confidential information at all times
- Shred confidential documents when they're no longer needed
- Make sure they only view confidential information on secure devices
- Only disclose information to other employees when it's necessary and authorized
- Keep confidential documents within a locked filing box and a locked cabinet poolside when not in use.

What employees/volunteers shouldn't do:

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of our charity
- Replicate confidential documents and files and store them on insecure devices

When employees stop working for our company, they're obliged to return any confidential files and delete them from their personal devices.

We'll take measures to ensure that confidential information is well protected. We'll:

- Store and lock paper documents
- Encrypt electronic information and safeguard databases

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body requests it as part of an investigation or audit
- If our safeguarding lead is in contact with social services or the police about a safeguarding issue
- In an emergency situation where the emergency details have to be used and passed to a paramedic or medical professional

In such cases, employees involved should document their disclosure procedure. We're bound to avoid disclosing more information than needed.

Disciplinary Consequences

Employees/Volunteers who don't respect our confidentiality policy will face disciplinary and, possibly, legal action.

We'll investigate every breach of this policy. We'll terminate any employee/volunteer who willfully or regularly breaches our confidentiality guidelines for personal profit. We may also have to punish any unintentional breach of this policy depending on its frequency and seriousness. We'll terminate employees/volunteers who repeatedly disregard this policy, even when they do so unintentionally.

This policy is binding even after separation of employment.

All policies are reviewed every 24 months and agreed by the trustees and committee, the Chair signs off on behalf on the whole Shepshed Dolphin Swimming Group committee.

Chair of Trustees.....

Signed

Date