

## CONFIDENTIALITY POLICY

### Introduction and Purpose

The purpose of the Confidentiality Policy is to provide staff, volunteers and clients with the organisation's understanding of confidentiality, clear guidelines regarding handling of confidential information, to prescribe limits of behaviour and assign responsibilities.

Plymouth Dance reserves the right to change the policy and to expect adherence to the changed policy.

The Board of Directors of Plymouth Dance shall determine areas not specifically covered by these policies.

Confidentiality is central and integral part of the organisation; it offers safety and privacy. Information given is held in strict confidence and in line with Data Protection Acts.

This policy should be read in conjunction with our Data Protection Policy.

### Specific Responsibilities

Plymouth Dance is responsible for ensuring that all staff and volunteers involved in dealing with confidential information and data receive appropriate training, supervision and support regarding the policy and their legal responsibilities. All employees must sign a Confidentiality Agreement.

### Coordinating Producers Responsibility

The Coordinating Producer is responsible for ensuring that a copy of this document is available to all paid staff and volunteers and is available to users of the service. It is the responsibility of the Coordinating Producer to ensure paid staff and volunteers sign the Agreement and receive training as necessary.

### Individual's Responsibility

Individual paid staff and volunteers are required to act in accordance with the policy, failure to do so will be considered as an act of gross misconduct and will result in disciplinary action.

### Collecting information

Plymouth Dance collects and uses information for the following purposes:

- to undertake advertising, marketing, direct recruitment and public relations exercises.
- to meet insurance policy requirements.
- to provide personnel administration services.
- to update databases within Plymouth Dance.
- to enhance or improve service users experience of services.
- to provide online resources and services.
- to recruit and select paid staff and volunteers for available positions.
- to provide training and support services.

## Definition and principles of confidentiality

All information that:-

- a. is or has been obtained during, or in the course involvement, or has otherwise been acquired in trust due to involvement with the organisation,
- b. relates particularly to the organisation's business, clients or that of other persons or bodies with whom we have dealings of any sort, and
- c. has not been made public by, or without our authority, is confidential, and (save in the course of our business or as required by law) a paid member of staff/volunteer/service user shall not at any time, whether before or after the end of their involvement, disclose such information in any form to any person without our written consent.

Paid staff/volunteers are expected to exercise care to keep safe all documentary or other material containing confidential information, and at the time of end of an individual's involvement with the organisation, or at any other time upon demand, return to the organisation any such material in their possession.

Information held by the organisation and not independently available to a third party cannot be disclosed without the individual's written consent and permission from the Coordinating Producer.

## Storage of information

In the case of COVID-19 or any similar event where confidential documentation or data needs to be taken out of the Plymouth Dance office building, such data must be kept in a secure location and locked at all times with key/padlock. Similarly, if data is transferred onto personal devices it must be kept secure with password protection. The removal of any confidential documents/data from the Plymouth Dance office building must be approved by the Coordinating Producer.

## Limits to Confidentiality

In exceptional circumstances Plymouth Dance may need to break confidentiality if they believe there is a real intent of serious harm or danger to either their client or another individual. Such circumstances may pertain to issues relating to sexual abuse, rape, self-harm, suicidal ideation or criminal activity. In such cases, as far as is possible, a full explanation will be given regarding the necessary procedures that may need to be taken.

## Data Protection Responsibilities

In addition to the duty of care regarding Confidentiality outlined above, the Data Protection Acts imposes legal obligations on Plymouth Dance, its paid staff and volunteers.

Plymouth Dance takes seriously its responsibilities under the Data Protection Acts. The organisation is aware of and acts in accordance with the following eight Data Protection principles regarding information:

1. Obtain and process information fairly
2. Keep information only for one or more specified, explicit and lawful purposes
3. Use and disclose information only in ways compatible with these purposes
4. Keep information safe and secure
5. Keep information accurate, complete and up-to-date
6. Ensure information is adequate, relevant and not excessive
7. Retain the information for no longer than is necessary
8. Allow individual's access to their personal data, on request

### Wrongful disclosure

Wrongful disclosure can occur in at least two ways; either by act or omission. The first would be where confidential information is deliberately passed on to a third party. The second would be where confidential information is disclosed to a third party through negligence. Wrongful disclosure will be considered as an act of gross misconduct and will result in disciplinary action

### Policy Feedback and Review

Plymouth Dances Data Protection Policy outlines our Data protection practices and procedures and is available on request from the Coordinating Producer. Constructive feedback on this Policy is always welcome; this must be given to June Gamble, Coordinating Producer of Plymouth Dance, who will ensure that the Board of Directors considers it.

All Plymouth Dance policies are to be read annually by all Plymouth Dance Directors, staff and volunteers, as well as whenever a policy is updated.

**Date of adoption:** 21st July 2020

**Review date:** 21st July 2021