# **Kingsclere Charities Confidentiality Policy**

#### Statement of intent

The Kingsclere Charities is an umbrella organisation supporting the management for the following:

- Kingsclere welfare charities
- Kingsclere almshouse charities
- The Robert Higham apprenticing charity
- The educational foundation of Robert Higham

This policy is applicable to all the above charities.

This policy is intended to protect Trustees and employees and clients.

### Kingsclere Charities:

- Are committed to respecting the privacy of our clients, employees, and Trustees.
- Are committed to ensuring that all information concerning Trustees, clients, former clients, employees, financial data, and business records is treated as confidential and held securely.

## **Policy**

- Confidential is defined as information that you need to have access to
  effectively carry out the business of the charity, but that you are not
  permitted to disclose. This includes clients' names and anything that will
  make their identity known.
- Kingsclere Charities expects all Trustees and Employees to respect the privacy of clients and to maintain their personal and financial information as confidential.
- Trustees and employees are responsible for maintaining the confidentiality of information relating to other staff members and Trustees
- Kingsclere Charities are committed to ensuring that Trustees and employees do not disclose or discuss personal and financial information that is confidential with anyone outside of the charity without permission or authorization from the Trustees.

- Kingsclere Charities are committed to ensuring that Trustees and employees understand that confidential sensitive and privileged information must be kept confidentially, both during and after employment.
- Kingsclere Charities will bring to the attention of all Trustees and employees that unauthorized disclosure of confidential or privileged information is a serious violation of this policy and may subject the person(s) who made, or allowed, the unauthorized disclosure to appropriate disciplinary action, including verbal warning, written warning, final written warning, or dismissal.

### **Application in Practice**

All Trustees and employees must:

- Respect the privacy of our clients, employees, and Trustees.
- Not disclose or discuss personal and financial information that is confidential with anyone outside of the charity without permission or authorization from the Chair of the Trustees.
- Not release confidential information without appropriate authorization.
- Take all reasonable measures to ensure that unauthorized individuals do not overhear any discussion or have unauthorised access to any confidential information or documents.
- Take all reasonable measures to ensure that documents or other material containing confidential information are not left in the open or inadvertently shared.
- Take all reasonable measures to ensure confidential information held on any IT based system cannot be accessed by unauthorised persons or organisations.
- Understand that they are responsible for maintaining the confidentiality of information relating themselves and to other employees members and Trustees
- Understand that confidential, sensitive, and privileged information must be kept confidentially, both during and after employment.
- Ensure that documents, files, and any other material containing privileged, sensitive, or confidential information, are returned on leaving the charities employment or leaving the Board of Trustees.

- Trustees will bring to the attention of other Trustees and all employees the provisions of this policy and will provide such training as is necessary to ensure its effective implementation.
- Trustees and employees will have responsibility for the operation of the policy.
- All Trustees and employees have a duty to do everything they can to ensure that the policy operates in practice.

### **Code of Conduct**

- Breeches of this policy will be taken seriously. Options for resolution include:
- 1. Appearance before the board of Trustees to explain their actions.
- 2. An acceptable apology and an undertaking that the contravention will not be repeated.
- 3. Disciplinary action including verbal warning, written warning, final written warning, and dismissal.
  - Any directly involved person has the right to appeal against a decision made. The board of Trustees will appoint an independent person or organisation to hear any appeals. The decision of the person hearing the appeal will be final.
  - Any directly involved person has the right to be represented in any hearing.
  - All parties retain the right to refer the case to a higher authority such as a relevant regulatory body

### How to make a complaint

Complaints against anyone in relation to this policy should be made confidentially, either in person, or in writing to the Clerk to the Kingsclere Charities. In the event of the Clerk being directly implicated in the complaint, the complaint should be taken to the one the Chairs of the constituent charities.

#### Review

This policy will be reviewed annually

Signed: P Crisford

**Print Name: Philip Crisford** 

Date:17.2.2022

Target Review Date: 17.2.2023