



# Confidentiality Policy

## All Saints' Church, Walsoken

Please refer to Document S&S\_Doc\_001 for all Safeguarding and Social requirements.

### Specific Policy

This Safeguarding & Social (S&S) sub-policy controls confidentiality at church.

#### Introduction

The purpose of this policy is to introduce the concept of confidentiality for the processing of information by All Saints' Church, Walsoken. This policy will raise awareness of the importance of confidentiality and set out a framework for the processing of sensitive information by those acting on behalf of All Saints' Church, Walsoken. Sensitive information can include:

- 1) Personal Information.
- 2) Sensitive Personal Information.
- 3) Commercially Sensitive Information.
- 4) Sensitive Church Information.

#### Definition

Confidentiality means that no information regarding a person with whom we are in contact shall be given to any third party external to the Church without that person's prior consent to disclose such information.

We place the highest importance on the fact that all people should be able to access our ministry and services in confidence.

#### The Basis of Confidentiality

No member of the congregation or volunteer may discuss a person to whom ministry, or a service is provided with any third party but only with accredited and appointed staff or with other staff or volunteers involved in the ministry concerned.

Confidentiality must not be promised in cases where safeguarding is relevant, or where criminal activity is disclosed, or where other behaviour is disclosed which may place the individual or others at risk of harm. In such cases the provisions of our Safeguarding Policy apply, or the disclosure must be shared with the priest in charge (or in their absence with the Parish Safeguarding Officer). If necessary, contact the Diocesan Safeguarding Advisor for advice.

#### Application

This policy applies to all members of the PCC and to those acting on its behalf. It is also our PCC's expectation that it will be observed by all Church members and others taking part in the activities and services of the Church. All PCC members and volunteers will be made aware of the policy which will be published on the Church's website

### Reference Documents

The Data Protection Act 2018

Human Rights Act 1989

Public Interest Disclosure Act 1998

General Data Protection Regulation 2018

The Data Protection Act 2018

UK General Data Protection Regulation 2018

### Procedure

#### Statistical Recording

our PCC is committed to the effective statistical recording of information which is required by central Church authorities or by external funding bodies. This information helps us to monitor the effective provision of our ministry and services. Any statistical records given to third parties shall be produced in anonymous form so that individuals cannot be identified. Any other information given in annual reports, publicity or other illustrative documents shall be

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presented in such a way that it would be impossible to identify individuals, unless prior consent has been given by the individuals concerned.

### Personal Records

All data which identify individuals, and which contain personal information relating to them shall be always kept securely. When personal records or information is no longer needed it will be destroyed in a confidential manner.

### Clergy Vacancy

Before a clergy vacancy the safeguarding officer and the exiting clergy must make consideration to the secure storage of safeguarding records during a clergy vacancy.

### Legal Framework

our PCC will monitor this policy to ensure that it meets legal requirements, including the General Data Protection Regulation and other relevant legislation.

The Data Protection Act 2018 and UK General Data Protection Regulation 2018 govern the use of personal information through the eight data protection principles, and the PCC will seek to apply these.

so that personal information is.

- 1) Processed fairly and lawfully.
- 2) Processed for one or more specific and lawful purposes and not further processed in any way that is incompatible with the original purpose.
- 3) Adequate, relevant and not excessive.
- 4) Accurate and, where necessary, kept up to date.
- 5) Kept for no longer than is necessary for the purpose for which it is being used.
- 6) Processed in line with the rights of the individuals.
- 7) Kept secure with appropriate technical and organisational measures taken to protect the information.
- 8) Not transferred outside the European Economic Area (unless there is adequate protection for the personal information being transferred).

One of the key provisions of the Data Protection Act 2018 is that personal information must be used fairly and lawfully. The PCC will tell individuals what their personal information will be used for, and make sure that its use for personal information does not break any other laws. When personal information is obtained, the PCC will tell individuals:

- 1) The name of our organisation.
- 2) What their information will be used for.
- 3) Any other information needed to make the use of their personal information fair.

The PCC will also tell the individual that they have a right to access their information, and have it corrected if it is factually inaccurate, and explain any ways in which information might be used that they might not expect, for example, passing the information to other organisations.

### Physical Security

- 1) Confidential information must be kept in a secure environment.
- 2) Information must be put away securely when not in use.
- 3) Confidential information must never be left unattended.
- 4) When transferring confidential information, it must always be passed to an authorised Officer. It must never be left on a desk or other unsecure place. All confidential information must be disposed of appropriately; confidential information or equipment (i.e. encrypted USB's) must not be placed in normal waste or recycling bins.

### Transportation of information

- 1) Confidential information must not be taken out of a secure environment without a justified reason.
- 2) Before taking confidential information out of a secure environment, always consider if it can be summarised or anonymised.
- 3) If confidential information and equipment is taken out of a secure environment, then it must be kept secure and returned as soon as possible.
- 4) Confidential information and equipment must never be left unattended on public transport, personal transport or in public areas.
- 5) Where confidential information or equipment is outside of a secure environment overnight, it must be stored in a secure location.

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### **USB's and portable drives**

Only encrypted USB memory sticks and drives may be used.

### **Telephone and Private Conversations**

- 1) Officers should not disclose confidential information over the telephone unless they have satisfied themselves as to the identity of the requester and are in a secure environment to prevent information being overheard by others.
- 2) When answering the telephone consider where you are positioned and who is around you, where the call is private you should ensure you are in a place to take that call.

### **Emails**

- 1) When sending confidential information via email, always use a known secure email account.
- 2) Always check the recipients email address before sending, where required send a test email.
- 3) When sending confidential information ensure this is transferred either by a password protected file or via a known secure email address.

### **Social Media**

- 1) No confidential information must ever be published on to any social media sites.

### **Breaches in Policy**

- 1) Breaches of the Confidentiality Policy may result in an investigation. The unauthorised disclosure of personal information is an offence under GDPR.
- 2) Any confidential information which is obtained accidentally must be reported immediately, otherwise this will be seen as a breach in policy.
- 3) If you are found to have obtained confidential information for personal gain it may result in court action.

## **Forms**

None

## **Diagrams**

None

## **Appendices**

None

For internal use only. While every effort has been made to ensure accuracy, this policy does not account for future judicial or church interpretation, decisions or any English legal changes that may alter its basis between revisions. All Saints' Church, Walsoken does not accept any liability resulting from the use of these policies by others. All decisions made based on these policies by others are at their own risk, and All Saints' Church, Walsoken disclaims any liability for losses incurred.