



WE REMEMBER SUBMARINERS

Confidentiality Policy

Policy brief & purpose

This confidentiality policy has been written to explain how we expect our charity officials to treat confidential information. As part of our respective positions, we will unavoidably receive and handle personal and private information. This guidance is to ensure that this information is well-protected.

We must protect this information for several reasons. This may include:

- Customer data
- Membership data
- Be a protected conversation, meeting, or email

Scope

This policy affects all Trustees, the Management Team, including the Chairman and ex-Officio's, Ambassadors and volunteers, who may be privy to certain confidential information.

Common examples of confidential information are:

- Unpublished financial information
- Contact details of shop customers
- Charity Membership lists
- Data entrusted to our charity by external parties
- Documents and processes explicitly marked as confidential
- Items discussed during monthly meetings

Authorised officials may have varying levels of access to confidential information.

What employees should do:

- Annotate any emails containing sensitive data in the Subject Line with 'Strictly in Confidence', 'In Confidence – Limited Circulation' or 'In Confidence – Personal Data' as appropriate.
- In telephone conversations or online meetings, make it clear to all that the following information is to be considered confidential and not to be disclosed to anyone outside of the meeting/call.
- Only disclose information to other officials and members when it's necessary and authorised by the Chairman.

- Keep confidential documents inside our charity's shared areas on MS Teams unless it's necessary to move them.

What employees 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 volunteers stop working for our charity, they're obliged to delete any confidential files from their personal devices.

Confidentiality Measures

- We must take care to ensure that confidential information is well protected.
- Store all documents in SharePoint (MS Teams) and restrict access to only those requiring it.
- Be compliant with GDPR.
- Encrypt electronic information and safeguard databases.
- Ask all Officials to sign non-disclosure agreements (NDAs).

Exceptions

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

- If a regulatory body request it as part of an investigation or audit.
- If the charity enters a partnership that requires disclosing some information (within legal boundaries).
- In such cases, employees involved should document their disclosure procedure and seek authorisation from the Chairman.

Infringements

The Chairman and trustees will investigate every breach of this policy.

Any breach of this policy may lead to the perpetrator being removed from the group and/or action being taken under the charity's disciplinary policy.