



The Real Junk Food Project Central

Official Governance

RCG0002

Confidentiality Policy V4

Ratified on Wednesday 21st of November 2018

This Official Governance is a living document

The document and its contents are subject to revision, replacement and abolition, upon the unanimous decision of the Board of Directors

This Official Governance is not confidential

The document and its contents are liable to public access and scrutiny, and must be published freely by the Board of Directors

The Real Junk Food Project Central

• **Official Governance** •

Document RCG0002



The Real Junk Food Project Central CIC

Confidentiality Policy

1. Policy statement

- A) The Real Junk Food Project Central CIC (hereby referred to as “the Company”) recognises that its volunteers and employees gain information about individuals and organisations during the course of their work or activities. In most cases, such information will not be stated as confidential, and volunteers and employees may be required to exercise common sense and discretion in identifying whether the individuals or groups expect the Company to keep the information confidential.
- B) This policy aims to give guidance; if in doubt, volunteers and employees should consult the Board of Directors.
- C) The purpose of this policy is to establish guidelines which:
- Reduce the threat of a security breach and information theft.
 - Ensure compliance with the General Data Protection Regulations; processing personal data in the manner prescribed by law.
 - Reduce the risk of identity theft.
 - Evidence the Company’s commitment to taking responsibility for the personal data in its care.
- D) Information which is received by the Company as part of the services it provides, but is not considered to be personal data under the General Data Protection Regulations, will be considered to be information for the Company to share with colleagues and use to deliver its aims and objectives unless explicitly stated otherwise.

2. Operating practices

- A) The Company will inform groups, organisations or individuals why it is requesting information and explain the purpose of storing and using this information.
- B) The Company will gain consent to keep and use this information, particularly relating to the database of volunteers and employees, in accordance with its legal obligations under the General Data Protection Regulations.
- C) The Company, its volunteers and employees will avoid exchanging personal information or comments about individuals with whom they have a professional relationship.



- D) If the Company receives information from individuals outside of the Company regarding the conduct of volunteers, employees, organisations or any other group, then this should be dealt with sensitively. The appropriate volunteer or employee should tell the individual about the Compliments and Complaints Procedure and advise them accordingly.

3. Purpose of the processing of personal data

- A) The purpose of the processing of personal data is outlined in the Company's Privacy Statement in accordance with the General Data Protection Regulations.
- B) The Confidentiality Policy is complementary to the Company's Privacy Statement. The Company recognises and commits to adhering to all statutory legislation concerning the processing of personal data.

4. Duty to disclose information

- A) The Company has a legal duty to disclose information related to child protection (which will be reported to the appropriate social care authority) and criminal activity, not limited to disclosures concerning drug trafficking, human trafficking, money laundering, acts of terrorism and theft (which will be reported to the police).

5. General Data Protection Regulations

- A) The Board of Directors recognises the Company's obligations concerning the processing of personal data under the General Data Protection Regulations.
- B) The Board of Directors has prepared and made publicly available the Company's Privacy Statement, which outlines the Company's commitment to data protection and the measures being taken to ensure compliance with the law.

6. Breach of confidentiality

- A) Volunteers or employees who are dissatisfied with the conduct or actions of other volunteers or employees should raise this with the Board of Directors, using the process prescribed by the Compliments and Complaints Policy if necessary.

7. Monitoring and review



CENTRAL

- A) This policy will be issued to all employees and volunteers. Any monitoring information collected will be used to monitor the effectiveness of the Confidentiality Policy. Information will be processed in accordance with the General Data Protection Regulations, as outlined in the Company's Privacy Statement.
- B) The Confidentiality Policy will be reviewed six months from the date of approval. The next review of this policy shall be conducted and approved no later than **Wednesday 29th of May 2019.**

8. Approval

Version 4 of the Confidentiality Policy was reviewed and approved by the Board of Directors on **Wednesday 21st of November 2018.**