**Confidentiality Policy**

**1. General principles**

1.1. Rossendale Drum Majorettes recognises that Members (parents/guardians, volunteers) gain information about individuals and organisations during the course of their activities. In most cases such information will not be stated as confidential and Members may have to exercise common sense and discretion in identifying whether information is expected to be confidential. This policy aims to give guidance but if in doubt, seek advice from Simon Creasey, Rossendale Drum Majorettes Director.

1.2. Members are able to share information with Senior Committee members (Simon, Jeanette, Emma & Catrina) in order to discuss issues and seek advice.

1.3. Members will avoid exchanging personal information or comments about individuals with whom they have a professional relationship.

1.4. Talking about the private life of a member is to be avoided at all times, unless the member in question has instigated the conversation.

1.5. Members will avoid talking about Rossendale Drum Majorettes or its members in social settings or on social media where the reputation of the group can be brought into question due to slanderous information being publicly shared. .

1.6. Members will not disclose to anyone, other than Senior Committee Members, any information considered sensitive, personal, financial or private without the knowledge or consent of the individual, or a member in the case of the organisation.

1.7. There may be circumstances where Members would want to discuss difficult situations with each other to gain a wider perspective on how to approach a problem.

The organisation’s consent must be sought before discussing the situation, unless the member is convinced beyond doubt that the organisation would not object to this. Alternatively, a discussion may take place with names or identifying information remaining confidential.

1.8. Where there is a legal duty on Rossendale Drum Majorettes to disclose information, the person to whom the confidentiality is owed will be informed that disclosure has or will be made.

**2. Why information is held**

2.1. Most information held by Rossendale Drum Majorettes relates to individuals and remains private and confidential only accessible by the Rossendale Drum Majorettes Director or Senior Committee Team in their absence.

2.2. Information is kept to enable Rossendale Drum Majorettes Members to understand the history and activities of individuals or organisation in order to deliver the most appropriate services.

2.3. Rossendale Drum Majorettes has a duty of care to keep written information about its Members remains confidential.

2.4. Information about members is given to the Rossendale Drum Majorettes Director, but to no one else.

2.5. Information about ethnicity and disability of users is kept for the purposes of monitoring our equal opportunities policy.

**3. Access to information**

3.1. Information is confidential to Rossendale Drum Majorettes as an organisation and may be passed to Members and Parents & Guardians of members to ensure the best quality service for users.

3.2. Where information is sensitive, i.e. it involves disputes or legal issues; it will be confidential to the member dealing with the case and Rossendale Drum Majorettes Director. Such information should be clearly labelled ‘Confidential’ and should state the names of the Members entitled to access the information and the name of the individual or group who may request access to the information and kept securely.

3.3. Members will not withhold information from the Senior Committee Team unless it is purely personal.

3.4. Users may have sight of Rossendale Drum Majorettes records held in their name or that of their organisation. The request must be in writing to the Director giving 14 days’ notice and be signed by the individual. Sensitive information as outlined in para 3.2 will only be made available to the person or organisation named on the file.

3.5. Employees may have sight of their personnel records by giving 14 days’ notice in writing to the Director.

3.6. When photocopying or working on confidential documents, Members must ensure people passing do not see them. This also applies to information on computer screens.

**4. Storing information**

4.1. General non-confidential information about Rossendale Drum Majorettes is kept on the organisations Social Media and Members Only Pages for members, parents and guardians to access.

4.2. Personnel information on members, volunteers and other individuals working within Rossendale Drum Majorettes will be kept in the Directors RDM bag and will be accessible to the Director only.

4.3. Files or records bearing confidential information should be labelled ‘confidential’.

4.4. In an emergency situation, the Director of Rossendale Drum Majorettes may authorise access to confidential information to the Senior Committee Team.

**5. Duty to disclose information**

5.1. There is a legal duty to disclose some information including:

5.1.1. Child abuse will be reported to Lancashire children’s Social Care Team and/or the police.

5.1.2. Drug trafficking, money laundering or acts of terrorism will be disclosed to the police.

5.2. In addition Members believing an illegal act has taken place, or that a member is at risk of harming themselves or others, must report this to the Director who will report it to the appropriate authorities.

5.3. Users should be informed of this disclosure.

**6. Disclosures**

6.1 Rossendale Drum Majorettes complies fully with the DBS Code of practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.

6.2 Disclosure information is always kept separately from an applicant’s personnel file in secure storage with access limited to those who are entitled to see it as part of their duties. It is a criminal offence to pass this information to anyone who is not entitled to receive it.

6.3 Documents will be kept for a year and then destroyed by secure means.

Photocopies will not be kept. However, Rossendale Drum Majorettes may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

**7. Data Protection Act**

7.1. Information about individuals, whether on computer or on paper, falls within the scope of the Data Protection Act and must comply with the data protection principles.

These are that personal data must be:

* Obtained and processed fairly and lawfully.
* Held only for specified purposes.
* Adequate, relevant and not excessive.
* Accurate and up to date.
* Not kept longer than necessary.
* Processed in accordance with the Act.
* Kept secure and protected.
* Not transferred out of Europe.

**8. Breach of confidentiality**

8.1. Members who are dissatisfied with the conduct or actions of other Members or Rossendale Drum Majorettes should raise this with the Director of Rossendale Drum Majorettes using the grievance procedure, if necessary, and not discuss their dissatisfaction outside Rossendale Drum Majorettes.

8.2. Members accessing unauthorised files or breaching confidentially may face having their membership terminated immediately.

**9. Whistle blowing**

Where the treasurer has concerns about the use of Rossendale Drum Majorettes funds, he or she may refer directly to the Director outside the usual grievance procedure.

All Members hold the right to inform either the Director or Senior Committee Team if they believe that Rossendale Drum Majorettes is being brought into disrepute by the actions of another member or ex-member.

**Date: 14/04/23 – Created by Simon Creasey (Director - Rossendale Drum Majorettes)**

**Reviewed: 24/06/24 – By Simon Creasey (Director - Rossendale Drum Majorettes)**