



CONFIDENTIALITY POLICY

Rotherham Allotment Alliance is committed to providing a confidential service to its Shareholders and allotment tenants. No information given to the RAA will be shared with any other organisation or individual without the user's expressed permission.

For the purpose of this policy, confidentiality relates to the transmission of personal, sensitive or identifiable information about individuals or organisations (confidential information), which comes into the possession of the RAA through its work.

We will hold personal data about our staff, shareholders and allotment tenants which will only be used for the purposes for which it was gathered and will not be disclosed to anyone outside of the RAA without prior permission.

All personal data will be dealt with sensitively and in the strictest confidence internally and externally.

Purpose

The purpose of the Confidentiality Policy is to ensure that all staff, shareholders, allotments tenants, volunteers understand the RAAs requirements in relation to the disclosure of personal data and confidential information.

Principles

The RAA will be fully compliant with the Data Protection Act 2018 / GDPR.

- The RAA is registered with the Information Commissioner's Office
- All personal paper-based and electronic data will be stored in accordance with the Data Protection Act 2018 and will be secured against unauthorised access, accidental disclosure, loss or destruction.
- All personal paper-based and electronic data must only be accessible to those individuals authorised to have access.

Statistical Recording

The RAA is committed to effective statistical recording of the allotment tenancies and other service providers in order to monitor usage and performance.

All statistical records given to third parties, such as to support funding applications or monitoring reports for the local authority shall be produced in anonymous form, so individuals cannot be recognised.



Breaches of Confidentiality

The RAA recognises that occasions may arise where individual members of staff or Board Member feel they need to breach confidentiality. Confidential or sensitive information relating to an individual may be divulged where there is risk of danger to the individual, a volunteer or employee, or the public at large, or where it is against the law to withhold it. In these circumstances, information may be divulged to external agencies e.g. police or social services on a need to know basis.

Where a member of staff or Board member feels confidentiality should be breached the following steps will be taken:

- The member of staff or Board member should raise the matter immediately with the Chair (or vice-chair) of the Board.
- The member of staff or Board member must discuss with the Chair (or vice-chair) issues involved in the case and explain why they feel confidentiality should be breached and what would be achieved by breaching confidentiality. The Chair (or vice-chair) should make a written note of this discussion.
- The Chair (or vice-chair) is responsible for discussing with the member of staff or Board member what options are available in each set of circumstances.
- The Chair (or vice-chair) is responsible for making a decision on whether confidentiality should be breached.

Legislative Framework

The RAA will monitor this policy to ensure it meets statutory and legal requirements including the Data Protection Act, Children's Act, Rehabilitation of Offenders Act and Prevention of Terrorism Act.

Ensuring the Effectiveness of the Policy

Existing and new workers will be introduced to the confidentiality policy via induction and training. The policy will be reviewed annually and amendments will be proposed and agreed by the Board of Directors.

Non-adherence

Breaches of this policy will be dealt with under the Grievance and/or Disciplinary procedures as appropriate.