

Voice of Freedom

c/o Skadden, Arps, Slate, Meagher & Flom, 40 Bank Street, London, E14 5DS7
e voicefreedomproject@gmail.com t +44 203 287528 w www.voiceoffreedom.org

Confidential Information Policy

About This Policy

1. We keep certain types of information confidential for important reasons, aligning with the values and aims of Voice of Freedom.
2. Because of the importance of maintaining the confidentiality of certain information, and because effective procedures for maintaining confidentiality require everyone's involvement and cooperation, we have implemented this confidential information policy.
3. This policy covers all employees, workers, officers, consultants, contractors, volunteers, casual workers, agency workers, and Trustees ('Staff').

Personnel Responsible For The Policy

1. The Trustees and the CEO have primary responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework.
2. Managers have a specific responsibility to ensure the fair application of this policy and all members of Staff are responsible for supporting colleagues and ensuring its success.

Definition of Confidential Information

1. "Confidential Information" as referred to in this policy, means any information that is not in the public domain and is intended to be protected from disclosure (whether it is sensitive or contains personal data of individuals). Information may be confidential irrespective of whether it is specifically labelled "confidential", or otherwise, or whether it is oral, written, drawn or stored electronically. Alternatively, labelling information "confidential" or other classification does not automatically make the information Confidential Information. Where information is sensitive, i.e. it involves disputes or legal issues, it will be confidential to the employee dealing with the case and their line manager. Such information should be clearly labelled Confidential and should state the names of the colleagues entitled to access the information and the name of the individual or group who may request access to the information.

MAINTAINING CONFIDENTIALITY

1. We limit disclosure of Confidential Information to:
 - (a) Staff with a need to know in order to perform their jobs.
 - (b) Third parties requiring the information for a legitimate purposes of the charity, including agencies, if service users are to be offered an effective service by Voice of Freedom;

2. You must treat all Confidential Information as strictly confidential both during engagement with Voice of Freedom and after your engagement ends. To maintain the confidentiality of Confidential Information, you must do the following:
 - (c) not access or use any Confidential Information to which you have not been provided access or authorisation to use.
 - (d) not disclose, publish, communicate, or make available Confidential Information to anyone who does not have the authority to know and use the Confidential Information, except as required to perform your job duties or otherwise permitted by this policy.
 - (e) if your duties require sharing Confidential Information with a third party, not do so until the organisation and the third party enter into a confidentiality agreement and you have consent from your line manager
 - (f) ensure all sensitive information is kept in a secure location with limited access.
 - (g) when photocopying or working on confidential documents, colleagues must ensure they are not seen by people in passing. This also applies to information on computer screens.
 - (h) information about volunteers and other individuals will be kept by the colleague directly responsible. These colleagues must ensure line managers know how to gain access.
 - (i) not discuss Confidential Information in public where it may be overheard, including elevators, restaurants, cabs, and public transportation.
 - (j) in the event of an inadvertent disclosure of Confidential Information, immediately inform your line manager
 - (k) return any Confidential Information in your possession on termination of the engagement.

3. This policy is not intended to restrict communications or actions that are protected or required by whistleblowing protection legislation such as the Public Interest Disclosure Act 1998, or otherwise disclosing information as permitted or required by law.

Where there is a legal duty for Voice of Freedom to disclose information, the person to whom the confidentiality is owed will be informed that disclosure has been, or will be, made. Examples of legal duties requiring such disclosures are:

- (a) child abuse which will be reported to the Children, Schools and Families Department
 - (b) drug-trafficking, money-laundering, acts of terrorism or treason which will be disclosed to the police
 - (c) when a colleague believes an illegal act has taken place, or that a service-user is at risk of harming themselves or others, which must report this to the CEO who will report it to the appropriate authorities.
4. If you are unsure whether information should be kept confidential, check with your line manager or if unavailable with the CEO or a trustee before disclosing the information or taking any other action.

5. All Staff are required to comply with this policy. A breach of this policy may lead to disciplinary action, up to and including termination of employment.

Confidentiality Obligations

We require all Staff to agree to abide by this Policy before receiving any of our Confidential Information. You must help ensure the protection of this Confidential Information by complying with these requirements when communicating or sharing information with a third party with whom we are doing business.

Monitoring

We reserve the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, for legitimate purposes which include ascertaining and demonstrating that expected standards are being met by those using the systems and for the detection and investigation of unauthorised use of the systems (including where this is necessary to prevent or detect crime).

Breach of confidentiality

1. Breach of this policy may result in disciplinary action up to and including dismissal, termination of engagements and/or termination of contracts, as applicable. Any member of Staff suspected of committing a breach of this policy will be required to co-operate with our investigation.
2. You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

Last updated: 22 October 2021