



Confidentiality Policy

**Market House
14 Market Street
Lerwick**

A charitable company limited by guarantee registered in Scotland No. 165677
Registered Office Market House, 14 Market Street, Lerwick, Shetland ZE1 0JP
Company Secretary Catherine Hughson
Recognised by the Inland Revenue as a Scottish Charity - No. SCO 17286

Voluntary Action Shetland

CONFIDENTIALITY POLICY

All employees, Board Members and volunteers have an obligation to adhere to this confidentiality policy.

For the purpose of this document, 'confidential information' is defined as: -

- The names, personal details, and information relating to the affairs of clients or members of Voluntary Action Shetland
- Matters of a technical nature, or financial and marketing information, business plans and any other information relating to the business of Voluntary Action Shetland
- Information which is imparted to the worker in circumstances in which the worker knows or ought reasonably to know that the information is confidential to Voluntary Action Shetland or any persons with whom Voluntary Action Shetland is concerned.

No information should be released to a third party without first seeking the agreement of the Executive Officer or project manager and/or the individuals concerned, as appropriate.

All personal information (computerised or otherwise recorded) collected and held by Voluntary Action Shetland is covered by the Data Protection Act. All employees and members of Voluntary Action Shetland must ensure that personal information is: -

- Obtained and processed fairly and lawfully
- Used only for the purposes for which Voluntary Action Shetland is registered, and disclosed only to appropriate people
- Adequate, relevant and not excessive in relation to the purpose for which they are held
- Accurate and kept up-to-date
- Held no longer than necessary
- Accessible to the individual concerned who, where appropriate, has the right to have information about themselves corrected or erased
- Safeguarded and stored securely to prevent accidental or intentional viewing by anyone not working within Voluntary Action Shetland

Reasonable care must be taken to ensure that discussions, conversations and telephone calls relating to clients cannot be overheard by other clients, or anyone not involved with Voluntary Action Shetland. However, this can exclude information that is public knowledge. A worker may use confidential information solely for the purpose of performing their duties as an employee of Voluntary Action Shetland). A worker may, with client consent, disclose personal information to persons that are aware that this information must

remain confidential and who have a need to know, but only to the extent that each person has a need to know.

The workers obligation of maintaining confidentiality does not extend to confidential information that the law requires to be disclosed; for example, where a child or vulnerable adult might be at risk of significant harm: please refer to VAS Protection of Vulnerable People Policy.

At the end of a worker's employment, the worker must ensure the following is returned to Voluntary Action Shetland

- All confidential information in material form
- All records or notes based on or incorporating confidential information
- All copies of records or notes based on or incorporating confidential information
- All Voluntary Action Shetland property

Any worker found to be in breach of this confidentiality obligation whilst employed by Voluntary Action Shetland will be disciplined and, in serious instances, dismissed.

The obligation of confidentiality will continue after the end of the worker's service in respect of all confidential information other than information forming part of the worker's general knowledge and skills.

Any ex-worker found to be in breach of this confidentiality obligation might be subject to legal action being taken against them, dependent upon the circumstances of the breach.

This policy will operate, where appropriate, in conjunction with the contract of employment and must be signed by the worker prior to commencement of employment.