

CONFIDENTIALITY POLICY



The CHURCH OF ENGLAND
The Diocese of Peterborough



Whitefriars Church,
Boughton Drive,
Rushden, NN10 9HX



THIS POLICY was first produced in 2016.

This policy has to be reviewed every three years. It was last reviews in September 2023. It is to be reviewed again in July 2026.

Signed: _____

Office: _____

1. Definition

- 1.1 We understand confidentiality to mean that no information regarding a person with whom we are in contact shall be given to any third party external to the Church without that person's prior consent to disclose such information.
- 1.2 We place the highest importance on the fact that all people should be able to access our ministry and services in confidence.

2. Basis of Confidentiality

- 2.1 No member of staff or volunteer may discuss a person to whom ministry or a service is provided with any third party but only with accredited and appointed staff or with other staff or volunteers involved in the ministry concerned.
- 2.2 Confidentiality must not be promised in cases where safeguarding is relevant, or where criminal activity is disclosed, or where other behaviour is disclosed which may place the individual or others at risk of harm. In such cases the provisions of our Safeguarding Policy apply, or the disclosure must be shared with the Vicar (or in their absence with the Parish Safeguarding Officer or the Children's and Family Minister or the Youth Minister). If necessary, contact the Diocesan Safeguarding Advisor for advice.
- 2.3 Licensed Ministers have basis of confidentiality written into their working agreements with the Vicar.

3. Statistical Recording

- 3.1 The PCC is committed to the effective statistical recording of information which is required by central Church authorities or by external funding bodies. This information helps us to monitor the effective provision of our ministry and services.
- 3.2 Any statistical records given to third parties shall be produced in anonymous form so that individuals cannot be identified.
- 3.3 Case studies or other information given in annual reports, publicity or other illustrative documents shall be presented in such a way that it would be impossible to identify individuals, unless prior consent has been given by the individuals concerned.

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4. Personal Records

- 4.1 All data which identify individuals and which contain personal information relating to them shall be kept securely at all times.
- 4.2 When personal records or information is no longer needed it will be destroyed in a confidential manner.

5. Legal Framework

- 5.1 The PCC will monitor this policy to ensure that it meets legal requirements, including the General Data Protection Regulation and other relevant legislation.
- 5.2 The Data Protection Act 2018 and UK General Data Protection Regulation 2018 govern the use of personal information through the eight data protection principles and the PCC will seek to apply these so that personal information is:
 - 5.2.1 processed fairly and lawfully;
 - 5.2.2 processed for one or more specific and lawful purposes and not further processed in any way that is incompatible with the original purpose;
 - 5.2.3 adequate, relevant and not excessive;
 - 5.2.4 accurate and, where necessary, kept up to date;
 - 5.2.5 kept for no longer than is necessary for the purpose for which it is being used;
 - 5.2.6 processed in line with the rights of the individuals;
 - 5.2.7 kept secure with appropriate technical and organisational measures taken to protect the information;
 - 5.2.8 not transferred outside the European Economic Area (the European Union member states plus Norway, Iceland and Liechtenstein) unless there is adequate protection for the personal information being transferred.
- 5.3 One of the key provisions of the Data Protection Act 2018 is that personal information must be used fairly and lawfully. The PCC will tell individuals what their personal information will be used for, and make sure that its use for personal information does not break any other laws. When personal information is obtained, the PCC will tell individuals:
 - 5.3.1 the name of our organisation;
 - 5.3.2 what their information will be used for;
 - 5.3.3 any other information needed to make the use of their personal information fair.
- 5.4 The PCC will also tell the individual that they have a right to access their information and have it corrected if it is factually inaccurate, and explain any ways in which information might be used that they might not expect – for example, passing the information to other organisations.

6. Application

- 6.1 This policy applies to all members of staff, to all members of the PCC and to those acting on its behalf. It is also the PCC's expectation that it will be observed by all Church members and others taking part in the activities and services of the Church.
- 6.2 All members of staff and volunteers will be made aware of the policy which will be published on the Church's web-site.
- 6.3 The PCC will keep the policy under review.