

Confidentiality Policy

The processing of personal data is governed by the General Data Protection Regulation 2018 (the GDPR). Trustees, members and staff are covered under the NHS Retirement Fellowship's GDPR Data Privacy Notice

1. General principles

- 1) The NHS Retirement Fellowship recognises that members, trustees and staff gain information about individuals during the course of their work or activities. In most cases such information will not be stated as confidential and individuals 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, the advice of the Central Office may be requested.
- 2) Members are able to share information with others in the charity in order to discuss issues and seek advice.
- 3) Members, trustees and staff will avoid exchanging personal information or comments about individuals and will avoid talking about individuals in social settings.
- 4) Talking about the private life of an individual is to be avoided at all times, unless the person in question has instigated the conversation. Refer also to the Safeguarding Policy.
- 5) Individuals will not disclose to anyone any information considered sensitive, personal, financial or private without the knowledge or consent of the individual. Refer also to the Safeguarding Policy.
- 6) Where there is a legal duty on the NHS Retirement Fellowship 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

Information held by the NHS Retirement Fellowship relates to members, representatives, trustees and staff, to services or organisations that the charity works with and to organisations that regulate, support or fund them.

Information will comply with Charity Commission, the Office of the Scottish Charity Regulator (OSCR) and GDPR requirements and enable the NHS Retirement Fellowship to communicate with members and to provide benefits and services.

Information about ethnicity and disability of users is kept for the purposes of monitoring our equal opportunities policy, for reporting to funders and to provide appropriate services.

An information asset register will be created and maintained and there will be a designated data protection lead.

Access to information

Information is confidential to the NHS Retirement Fellowship as an organisation and may only be shared within the charity if a legitimate need can be demonstrated.

Members, trustees and employees may have sight of NHS Retirement Fellowship records held in their name. The request must be in writing to the Chief Executive giving 14 days' notice and be signed by the individual.

Accounting records relating to the charity must be made available for inspection by any trustee at any time

during normal office hours and may be made available for inspection by members having given 15 working days notice, if the trustees so decide.

A copy of the charity's latest available statement of account must be supplied on request to any trustee or member. A copy must also be supplied, within one month, to any other person who makes a written request and pays the Charity's reasonable costs.

4. Storing information

General non-confidential information is kept in unlocked filing cabinets and in computer files with open access

Personal information on members, employees, and other individuals working within the NHS Retirement Fellowship will be securely stored in lockable filing cabinets.

A guidance note will be developed about how long different records should be kept before disposal.

5. Duty to disclose information

There is a legal duty to disclose some information.

Members believing an illegal act has taken place or that an employee or member is at risk of harming themselves or others, must report this to the Chief Executive who will report it to the appropriate authorities.

The employee or member should be informed of this disclosure.

6. General Data Protection Regulations

Information about individuals, whether on computer or on paper, falls within the scope of the General Data Protection Regulation 2018 and must comply with the data protection principles.

7. Breach of confidentiality

Breaches of confidentiality will be treated seriously. Trustees, representatives, members and staff who have concerns about a matter of confidentiality relating to the conduct or actions of another or with the NHS Retirement Fellowship as an organisation, should raise this with the Chief Executive.

Trustees, representatives, members and staff accessing unauthorised files or breaching confidentially will face disciplinary action

Agreed by Audit and Investment Committee – 15.01.20

Signed:
Chairman of the Board of Trustees

Policy circulated to Staff :

Added to NHSRF website:

Review date: January 2023