



## **Essex Badger Protection Group**

### **Confidentiality Policy**

#### **Definitions**

"Group" means Essex Badger Protection Group.

"EBPG" means Essex Badger Protection Group.

"Colleague" means volunteers, members, committee members, and others who work with the group.

#### **General Principles**

The group recognises that colleagues (volunteers, committee & members & others who work within the group) gain information about individuals and organisations during their work or activities. In most cases, such information will not be stated as confidential, and colleagues may have to exercise common sense and discretion in identifying whether information is expected to be confidential.

This policy aims to give guidance but colleagues should seek advice from the Group committee if in doubt.

1. Information received by the EBPG as part of its services will be considered information for the Group to share with colleagues and use to deliver its aims and objectives.
2. Colleagues should inform groups, organisations or individuals why they request information and explain the purpose of storing and using it.  
Colleagues should ask permission to keep and use this information.
3. Colleagues can share information with the Group Chairperson to discuss issues and seek advice.
4. Colleagues will not disclose to anyone, other than the Group Chairperson, any information considered sensitive, personal, financial or private without the knowledge or consent of the individual or an officer in the case of an organisation.

5. Colleagues should avoid exchanging personal information or comments (gossip) about individuals or organisations with whom they have a professional relationship.
6. Colleagues should avoid talking about organisations or individuals in social settings.
7. There may be circumstances where colleagues would want to discuss difficult situations with each other to gain a broader perspective on how to approach a problem. This should be dealt with sensitively if colleagues receive information from individuals outside the Group regarding a colleague or group's conduct. The appropriate colleague should tell the individual about the Complaints and Problem-Solving Procedure and advise them accordingly.
8. Where there is a legal duty on the EBPG to disclose information, the affected person will be informed that disclosure has, or will, be made.

#### Why information is held

1. Most of the group's information relates to badgers, members, partners (e.g., landowners and other organisations), the committee, and volunteers.
2. Information is kept to enable EBPG colleagues to understand the needs of badgers and deliver the most appropriate advice and protection.

#### Access to information

1. Information is confidential to the Group as an organisation and may be passed to colleagues to ensure the best quality service.
2. Where information is sensitive, i.e. it involves disputes or legal issues, it will be confidential to the colleague dealing with the case and the Group Chairperson. Such information should be clearly labelled 'Confidential'. It should state the names of the colleagues entitled to access the data and the name of the individual or group who may request access to it.
3. Colleagues will only withhold information from the Chairperson if it is purely personal to them and not business-related.
4. Members may see the group records that relate to them. The request must be written to the Group Chairperson, giving 30 days' notice. The individual must sign the letter.
5. Sensitive information, as outlined in point 2, will only be made available to the person or organisation named on the file.
6. When photocopying or working on confidential documents, colleagues must ensure people do not see them in passing. This also applies to information on computer screens.
7. All group members who access Group information will need to sign a Volunteer Services Confidentiality Statement (Appendix 1).

### Storing Information

1. Information about volunteers and other individuals will be kept securely by the colleague directly responsible. Colleagues must ensure the Group Chairperson knows how to gain access.
2. The Group Chairperson and/or Secretary will secure colleagues' personnel information.
3. Files or folders bearing confidential information should be labelled 'confidential' and password protected.
4. In an emergency, the Chairperson may authorise other people to access files.
5. Confidential documentation or personal data should be shredded before being placed in a recycling bin.

### Storage of EBPG Data on Computer Systems

EBPG holds the majority of its information on secure in-house managed computer database systems. All data held on these systems is covered by this policy. All group members who are given access to the system will need to sign a Volunteer Services Confidentiality Statement (Appendix 1).

### Duty to disclose information

1. The Group has a legal responsibility to disclose some information, including:
  - a. Child abuse will be reported to the Children's Services / Social Services Department.
  - b. Drug trafficking, money laundering, acts of terrorism, or treason will be disclosed to the police.
2. In addition, colleagues believing that an illegal act has occurred or that a volunteer is at risk of harming themselves or others must report this to the Group Chairperson, who will report it to the appropriate authorities.
3. The Group should inform the volunteers of this disclosure.

### Disclosures

1. The Group complies fully with the DBS (Disclosure and Barring Service) Code of Practice regarding the correct handling, use, storage, retention, and disposal of Disclosures and Disclosure information.
2. The Group will follow any required processes for DBS Checks for any volunteers whose posts involve contact with children or vulnerable adults, as specified by the Disclosure Guidance.
3. If applicable, the Group will clearly state the need for and level of disclosure on any recruitment advert.
4. Disclosure information is kept separately from an applicant's file in secure storage, with access limited to those entitled to see it as part of their duties. It is a criminal offence to pass this information to anyone not entitled to receive it.
5. Documents will be kept for a year and then destroyed by secure means. Photocopies will not be saved. However, the Group may keep a record of the

date of a Disclosure issue, the subject's name, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number, and the details of the recruitment decision.

#### Data Protection & GDPR

1. Information about individuals, whether on a computer or paper, falls within the scope of the Data Protection Act and must comply with the data protection principles.
1. That personal data must be:
  - i. Obtained and processed fairly and lawfully
  - ii. Held only for specified purposes
  - iii. Adequate, relevant and not excessive
  - iv. Accurate and up-to-date
  - v. Not kept longer than necessary
  - vi. Processed in accordance with the Act
  - vii. Kept secure and protected
  - viii. Not transferred out of Europe
2. The Group will ensure that it complies with all aspects of the Data Protection Act. Please refer to the Group Data Protection Policy & Procedures for detailed information on how we will do this.

#### Breach of Confidentiality

1. Colleagues dissatisfied with the conduct or actions of other colleagues or the Group should raise this using the Problem-Solving Procedure, if necessary, and only discuss their dissatisfaction within the Group.
2. Colleagues accessing unauthorised files or breaching confidentiality may face disciplinary action. Ex-volunteers breaching confidentiality may face legal action.

## Appendix 1 - Volunteer Services Confidentiality Statement



### **Essex Badger Protection Group** **Volunteer Services Confidentiality Statement**

I, the undersigned, do hereby acknowledge that in my volunteer role for the Essex Badger Protection Group, I may have access to confidential information contained in the records held within the organization, which relates to personal data about members of the public, other Group members and locations of badger populations.

I agree that I shall not disclose any such confidential information maintained by the Essex Badger Protection Group to any unauthorized person, and I will adhere to confidentiality guidelines of the Essex Badger Protection Group and the Badger Trust.

I acknowledge and agree that disclosure by me of confidential information obtained by me in the course of my volunteer status could be cause for termination from my volunteer position and membership of the Essex Badger Protection Group.

Signed: .....

Date: .....

Print Name: .....

**Volunteer**

I, the undersigned, do hereby certify that I have discussed the guidelines for confidentiality with the volunteer named above.

Signed: .....

Date: .....

Print Name: .....

**For The Essex Badger Protection Group**

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