

	Confidentiality Policy and Procedure	
	Type: Policy	Approval Date: 30.04.25
	Document Owner: Human Resources	Version: 2.0
	Document No: ORH-11	Review History: 22.06.21, 04.10.23, 20.11.24, 30.04.25
	Approved By: Board	

1.0 INTRODUCTION

At Our Rainbow House, we are committed to protecting the privacy and confidentiality of all sensitive information entrusted to us. Whether it involves personal details of our staff, volunteers, students, donors, or any other confidential data, we recognise the importance of safeguarding this information. This policy outlines our commitment to maintaining confidentiality and sets clear expectations for how all individuals associated with Our Rainbow House must handle and protect confidential information in the course of their work with us.

2.0 REFERENCE

Our Rainbow House Association Rules
Our Rainbow House Board Members' Induction Pack
Our Rainbow House Volunteer Induction Pack
Our Rainbow House Communications Policy and Procedure
Our Rainbow House Complaints Handling Policy and Procedure
Our Rainbow House Membership Application Form
Our Rainbow House Partnership Agreement Template
Our Rainbow House Privacy Policy and Procedure
Our Rainbow House Whistleblower Policy and Procedure

3.0 DEFINITIONS

Board means the governing body of Our Rainbow House.

Board Member a volunteer elected to the governing body at an Annual General Meeting of Our Rainbow House.

Confidential Information shall mean any information that is not generally available to the public and is entrusted to Our Rainbow House in the course of operations. This includes, but is not limited to:

- Personal data about students, staff, volunteers, or donors
- Financial information, budgets, and fundraising data
- Business strategies, plans, and internal communications
- Medical or educational records
- Any other information that is specifically marked as confidential or proprietary

Member shall mean any financial member of Our Rainbow House who has voting rights at a Business or Annual General meeting.

Our Rainbow House community shall mean all representatives of Our Rainbow House, students, guardians and family members, caregivers, sponsors, donors and visitors, i.e., anyone directly or indirectly involved in Our Rainbow House activities

Representative shall mean any board member, staff member, volunteer, student placement, apprentice, contractor, sub-contractor or any other person who is caused to undertake tasks or duties on behalf of Our Rainbow House.

4.0 SCOPE

This policy applies to:

- all representatives, sponsors and members of Our Rainbow House (as defined above).
- how representatives of Our Rainbow House handle confidential information acquired in the course of their duties.
- how members of Our Rainbow House handle confidential information acquired during Business or Annual General Meetings.
- how sponsors of Our Rainbow House students or staff handle confidential information acquired as a result of their sponsorship, such as personal details of the sponsored student or staff member.

5.0 PURPOSE

The purpose of this policy is to ensure that all sensitive, private, or confidential information that is shared with, or produced by, Our Rainbow House is protected. This includes information related to members, donors, staff, volunteers, students, organisational operations, and any other sensitive data that must be handled responsibly.

6.0 RESPONSIBILITIES

Director: The Director holds overall responsibility for the implementation of this policy. They ensure that all staff, volunteers, and stakeholders understand and comply with confidentiality requirements.

Board: The Board is responsible for educating new and existing representatives about confidentiality expectations and managing any breaches of confidentiality that may arise.

Representatives, Sponsors and Members: All representatives, sponsors and members of Our Rainbow House have a personal responsibility to comply with this policy. They are expected to safeguard confidential information and report any concerns or breaches to the Director or Board.

Compliance Officer: The Compliance Officer will have oversight of confidentiality practices, ensuring compliance with data protection regulations and addressing any issues related to the handling of personal or sensitive information.

7.0 POLICY STATEMENT

Obligations of Representatives of Our Rainbow House

- **Confidentiality Requirement:** All individuals who have access to confidential information are required to keep it private and not disclose it to third parties unless explicitly authorised in writing or required by law.
- **Use of Information:** Confidential information should only be used for the purpose for which it was provided, in alignment with the mission and work of Our Rainbow House.
- **Safeguarding Information:** All representatives and members of Our Rainbow House should take all reasonable precautions to protect confidential information from unauthorised access, theft, or misuse.

Exceptions to Confidentiality

There are certain circumstances under which confidential information may be disclosed:

- **Legal Obligations:** If required by law or a court order, confidential information may be disclosed to authorities.
- **Consent:** If the person to whom the confidential information belongs has given written consent for the disclosure.

Duration of Confidentiality Obligations

The confidentiality obligations outlined in this policy remain in effect even after an individual's association with Our Rainbow House ends. These obligations continue to apply unless the information is publicly available or no longer considered confidential.

8.0 PROCEDURE

Classifying Confidential Information

The Board may decide whether any Our Rainbow House records (not otherwise required by legislation, regulation, or the *Our Rainbow House Association Rules* to be made public) are deemed confidential. Where no express decision has been recorded, the assumption will be that the material is not confidential.

Where release of any material would involve the unreasonable release of personal information regarding any person, the Board may:

- declare that material to be confidential; or,
- if appropriate, remove identifying material from the material before release.

For those matters that the Board elect not to make public, all representatives and members will respect the confidentiality of these records and of any deliberations on those matters.

Representatives and Members of Our Rainbow House will not:

- Disclose to any member of the public any confidential information acquired by virtue of their position at Our Rainbow House;
- Use any confidential information acquired by virtue of their position at Our Rainbow House for their personal financial or other benefit or for that of any other person;
- Disclose to any member of the public any confidential information related to the interests of individuals, groups or organisations acquired by virtue of their position at Our Rainbow House;
- Make statements to the media in the name of the organisation except as specified in the *Our Rainbow House Communications Policy and Procedure*;
- Permit any unauthorised person to inspect or have access to any confidential documents or other information.

Meetings

Where appropriate, information identifying individuals may, with the consent of the Board, be removed by the Director or Secretary from material before its consideration at a meeting.

The Board may decide whether any non-members will be permitted to attend any or all of its meetings. Where appropriate, observers may be admitted subject to their undertaking to maintain confidentiality.

Safeguarding Confidential Information

- **Physical Security:** Confidential information should be stored securely, whether in physical files or digital format.
- **Digital Security:** Appropriate security measures, such as encryption, password-protected systems and secure email communication, should be used for storing, sharing or transmitting confidential information.
- **Access Control:** Only authorised individuals should have access to confidential information. Access should be limited to those who need it to perform their duties.

Reporting and Handling Breaches

- **Reporting Breaches:** If a breach of confidentiality is suspected or detected, it must be immediately reported as per the processes outlined in the *Our Rainbow House Complaints Handling Policy and Procedure* and *Whistleblower Policy and Procedure*.
- **Investigation and Action:** Any breach will be investigated promptly. If a breach is confirmed, appropriate action will be taken, which may include disciplinary measures, legal action, or other consequences as deemed necessary.

Consequences

Any violation of this confidentiality policy may result in disciplinary action, including but not limited to termination of employment or volunteer status, legal action, or other sanctions as deemed appropriate by Our Rainbow House, as per the disciplinary procedures laid out in the *Our Rainbow House Complaints Handling Policy and Procedure* and *Whistleblower Policy and Procedure*.

Training and Awareness

All representatives and partners of Our Rainbow House are required to acknowledge that they have read, understood, and agree to comply with this policy by signing the relevant induction or partnership agreement.

Our Rainbow House will provide regular training and updates on confidentiality and data protection to ensure all individuals understand their responsibilities and the importance of protecting sensitive information.

9.0 REVIEW

Date of next review: 30/04/2027 or after a serious incident, to determine if the policy and associated procedure has been effective.