



CONFIDENTIALITY POLICY

1. INTRODUCTION

- 1.1 The Community Foundation serving Tyne & Wear and Northumberland (the Foundation) holds sensitive information as part of its work. This sets out how staff, volunteers, committee members and Board members must ensure that all such information remains confidential and is not disclosed to third parties.

2. PURPOSE AND SCOPE

- 2.1 The purpose of this policy is to set out responsibilities for the Foundation's position on confidential and sensitive information in addition to the formal requirements for data protection set out in our separate policy.
- 2.2 The policy applies to all employees (including freelance staff and consultants), trustees (directors) and volunteers (including committee co-optees and grant panel members).

3. PRINCIPLES

- 3.1 The Foundation is privileged to receive a lot of personal and private information in the course of our business. We will not disclose confidential information to third parties or talk about trustee, volunteer, employee, donor, grantee or partner organisations' affairs in any way that would compromise them or the Foundation, except where we have express permission or are required to by law.
- 3.2 To ensure transparency, the Foundation publishes public information about its performance, income (including total value of donations) and expenditure (including grants) in its audited financial statements, publications, website and in other forms.
- 3.3 The Foundation allows donors to remain anonymous should they so wish as long as due diligence can be carried out on the provenance of gifts, and donations are made in line with the Gift Acceptance and Stewardship Policy.
- 3.4 The Foundation aims to support best practice in the philanthropy field and charity sector more widely, and may share examples of its documentation but these will always be anonymised where necessary to ensure confidentiality.
- 3.5 Papers for and minutes and notes of the Foundation's Board of trustees and its committees and grant panels are confidential.

4. RESPONSIBILITY FOR IMPLEMENTING THE POLICY

- 4.1 All trustees, volunteers and employees are personally responsible for ensuring the privacy of confidential information to which they have access.
- 4.2 Trustees, volunteers and employees must take the greatest care to secure confidential documents (e.g. those relating to applications, donors, funds, Board meetings and grant panels) and to make sure they are destroyed when no longer required. The Foundation provides facilities for the secure shredding of confidential documents.
- 4.3 Employees must only use their Community Foundation email for Foundation-related matters. Trustees and volunteers should use an individual email account in their name (which may be a personal account, or one provided by an organisation for which they work) for Foundation matters. Email accounts should not be shared with others (excepting legitimate access to someone's organisation account by e.g. their PA). Trustees, volunteers and employees must notify the Foundation if they suspect the email account they use for Foundation business has been hacked or compromised.
- 4.4 If a trustee, volunteer or employee is in any doubt about whether something is confidential, they should refer the matter to the Chief Executive or another member of the Executive in the first instance. They will decide whether anything can be disclosed.

5. FREEDOM OF INFORMATION REQUESTS

- 5.1 As a registered charity, the Foundation's activities are not covered by Freedom of Information legislation. However, the Foundation may enter into partnerships with public bodies which are covered. For example, the Foundation may be contracted to deliver a grant-making programme for a local authority or health body. In such circumstances, any documentation covering the arrangements between the Foundation and the public body concerned may be subject to freedom of information requests. However, where funds are held and distributed directly by the Foundation, we will not share details of applications or assessments, although records of decisions made on the recommendation of funding panels will be made available in response to a suitable request under the legislation.

6. BREACHES OF THE POLICY

- 6.1 Trustees, volunteers and employees must notify the Chief Executive as soon as possible if they believe or suspect that a breach of this policy has occurred or may occur in the future. Where any alleged breach relates to the Chief Executive, either the Chief Finance and Operating Officer or Chair of the Board should be notified.
- 6.2 In most cases breaches of the policy will likely be unintentional so may, following investigation, be dealt with informally and through reminders of the requirement to work within this policy. However, repeated or deliberate breaches could result in formal action. For employees, such issues will be dealt with under the Foundation's disciplinary procedure. For trustees, investigation will be carried out by the Governance, Finance and Audit Committee and could result in disqualification from the Board in line with the Trustee Code of Conduct. Breaches by volunteers will be investigated by the Chief Executive and could result in individuals being removed from committees or panels in line with the volunteer policy.

7. MONITORING AND REVIEW

- 7.1 The Foundation will monitor the effectiveness of this policy regularly to ensure its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. The policy will be reviewed by the Board every three years.

Date originally approved by Board	March 2010
This version	2023 2.2
Date this version approved by Board	20 September 2023
Date last updated	March 2020
Reason for last update	Planned review
Next review due	September 2026
Owner	Rob Williamson
Job title	Chief Executive
Related procedures if applicable	Data protection policy and procedures Privacy notice Trustee code of conduct Volunteer policy