

# **Sedbergh Swimming Club**

## **Confidentiality Policy**

The purpose of the Confidentiality Policy is to ensure that all staff, members, volunteers and users understand Sedbergh Swimming Club's disclosure of personal data and confidential information.

This policy applies to all staff, members, volunteers and users.

The information covered by the Confidentiality Policy includes:

- Information about individual members, volunteers and staff whether recorded electronically or in paper form. This includes – Name, address, telephone number, date of birth, email address, next of kin, medical information and any specialist needs eg learning differences or emotional requirements;
- Sensitive financial information;
- Confidential information – any document that has been marked 'confidential' or which has been verbally tagged 'not for circulation';
- Discussions/emails about a particular Club member.

All staff and volunteers must respect the need for confidentiality of information held about our members.

This policy should be read in conjunction with the Swimming Club's Privacy Notice.

## **Information about individuals**

Sedbergh Swimming Club is committed to ensuring confidential services to all individuals. Confidential information will not be sought from members of the Club unless expressly in the interests of that member, i.e. to enable a better delivery of the Club's services.

Information will only be passed to others outside of the Club with the consent of the member, where possible this will be with written consent.

No personal information about staff, volunteers or members will be given to any third party, this includes a member of their family, without their consent. Information will only be divulged on a "need to know" basis.

Information will be treated in confidence and will not be divulged to anyone outside the Club except where extenuating circumstances exist (see below). However, in order that we can provide the best possible help to our members it may be necessary to share information with another Committee Member within the Club.

In no circumstances should details of a member be discussed by anyone outside of the Club or in an open plan area in such a manner that it is possible to identify the person.

## **Use of member information for publicity, reporting or training purposes**

If one of our services has an outcome which would provide useful material for publicity, reporting or training purposes, then the permission of the client will be sought in writing before the story is

told to anyone else. If permission cannot be obtained then any details that would enable identification of the person to be made will be changed.

## **Limits to member confidentiality**

In certain circumstances the Club reserves the right to break confidentiality should this be deemed necessary. These circumstances include:

- If a member of staff believes that an individual could cause danger to themselves or to others;
- If a member of staff suspects abuse or has knowledge of abuse;
- If a parent/guardian/carer or Club member gives information which indicates that a crime has been committed;
- If disclosure is required by law, for example, by the Police;
- If a person is unable to make a specific decision when they need to;
- If the individual gives information which indicates a possible terrorist threat.

The decision on whether to break confidentiality will be decided on a case by case basis and we will always try and do this in conjunction with the involvement of the Club's Management Committee.

## **Access to data**

This Policy operates on a "need to know" basis and apart from staff and volunteers of the Club no-one will have access to the members information unless it is relevant to their work.

All members have the right to request access to all information stored about them, and have a right to see a copy of this confidentiality policy on request.

If any party concerned has a sensory or physical impairment, efforts should be made to ensure that all aspects of this policy and exchanges between parties are understood.

## **Evaluation and Monitoring**

All new members (including staff and volunteers) will be asked to agree that they have read the Confidentiality Policy and that they will abide by this policy.

Sedbergh Swimming Club will ensure that all staff and volunteers are trained in the application of this policy.

The policy will be reviewed in response to changes in relevant legislation, good practice or in response to an identified failing in its effectiveness.

Reviewed: 6/9/26