



Confidentiality Policy

Purpose

This policy has been developed to establish a framework for PBP Art (WA) Ltd. ("PBP") to protect and manage Confidential Information.

Scope

The policies and procedures in this document apply to PBP members, employees, volunteers, contractors, partners, affiliates and visitors under the direction of PBP

Policy Statement

PBP collects and uses a range of Confidential Information to govern the organisation and manage its operations; Confidential Information must remain confidential at all times.

PBP commits to keeping personal information confidential and protecting the privacy of people with whom it comes into contact.

Definitions

Confidentiality means the protection and management of Confidential Information.

Confidential Information includes, but is not limited to:

- Any information which is specified by PBP to be confidential
- PBP's intellectual property
- Policies, procedures and plans
- Financial information
- Any information that may be commercially valuable to PBP, its suppliers or contractors
- Information about donors and funders
- Board information, including agendas, meeting minutes, submissions, letters and reports
- Student information, including referrals, assessments, progress notes and reports
- Personal Information about Board members, Partners, employees, contractors, volunteers, partners, affiliates, teachers and students
- Staff personnel files
- Conflicts of interest declarations
- Incident reports



Personal Information means any information that can lead to a person being identified, such as name, date of birth, age, address, sexuality, marital status, partner information.

Privacy means activities that protect people from unfair or unauthorised use of sensitive information or Personal Information.

Roles and Responsibilities

While the responsibility to safeguard children and vulnerable people is shared by all who work at or with PBP, some individuals have specific obligations with which they must comply.

Board members

- Establishing a system for managing Confidential Information.
- Monitoring compliance with this policy.
- Reviewing this policy annually to ensure it is operating effectively and updating it when necessary.
- Keeping Confidential Information in strict confidence.
- Upholding the Confidentiality Agreement.

Board Secretary

- Implementation of this policy as it relates to Board confidentiality.
- Establishing and implementing records management procedures for designating and storing confidential Board information.
- Storing Confidentiality Agreements signed by Board members.

Chief Executive Officer (CEO)

- Implementation of this policy as it relates to organisational confidentiality.
- Establishing and implementing records management procedures for designating and storing confidential organisational and employee information.
- Storing Confidentiality Agreements signed by employees, volunteers and contractors.

Program Coordinators

- Training employees, volunteers and contractors in the management of Confidential Information.
- Establishing and implementing records management procedures for designating and storing confidential operational information.



Employees, Volunteers, Contractors, Partners, Affiliates and Visitors

- Following the requirements of this policy.
- Keeping Confidential Information in strict confidence.
- Upholding the Confidentiality Agreement.

PROCEDURES

Identification of Confidential Information

PBP's records management processes will incorporate procedures for designating information confidential.

Any Confidential Information on which restrictions have been placed shall be as far as possible clearly identified on the document or file itself.

Where categories of information, rather than individual documents, are restricted this restriction will be explained to the relevant people dealing with this information.

Protection of Confidential Information

Confidential Information shall be kept separate from other (non-confidential) documents and stored in a manner which limits access to them by unauthorised persons.

The Board Secretary will be responsible for managing confidential Board information, the CEO will be responsible for managing confidential organisational and employee information, and Program Coordinators will be responsible for managing confidential operational information.

Confidentiality Agreement

All Board members, employees, volunteers and contractors who deal with Confidential Information will be required to sign a Confidentiality Agreement.

Breaches of the Confidentiality Agreement may lead to dismissal and/or cessation of engagement with PBP.

Obligations towards managing Confidential Information under the Confidentiality Agreement will continue after a person ceases their involvement with PBP.



Release of Confidential Information

Any requests to divulge confidential Board information to a third party outside of the organisation will require written approval by the Board Chairperson.

Any requests to divulge confidential organisational, employee or operational information to a third party outside of the organisation will require written approval by the CEO.

Expert Advice

Nothing in this policy is intended to prevent the Board or the CEO from seeking confidential legal, accounting, financial or other expert advice from independent professionals to assist the Board and PBP in carrying out its functions.

RELATED POLICIES

Board, Staff and Volunteer Induction Policies

Privacy Policy

Risk Management Policy

RELEVANT LEGISLATION

Privacy Act 1988

Confidentiality Agreement

To be completed by PBP Board Members, Employees, Staff, Volunteers, Partners, Affiliates, Contractors or Visitors

Contact admin@pbp.org.au to complete the Confidentiality Agreement as part of the Board, Staff or Volunteer Induction Process