

Confidentiality and Data Protection Principles for use in the Catholic Church of England & Wales

In the course of your role as ()
it is expected that you will be receiving; handling and storing personal and sensitive information.

This document summarises the key principles of the Data Protection Act 1998 and provides guidance explaining the expectations of **(The Parish of St Lawrence and St Paul and the Roman Catholic Diocese of Clifton)** associated to the Confidentiality Agreement that you are required to sign in order to undertake the role.

Key Principles concerning confidentiality and Data Protection legislation

Often the Data Protection Act (1998) can be viewed as confusing and complex however in practical terms the Act tries to reflect how each of us expect organisations to obtain personal information about us; in what circumstances; for what purpose; for how long and when it will be shared and with whom.

There are 8 principles within the Data Protection Act 1998 which require that personal information (data) is:

1. processed fairly and lawfully (*we have legitimate grounds to collect and use the data and be transparent about how we use the data from the point at which we collect it*)
2. processed for limited purposes (*we are clear from the outset about why we are collecting the data and what we intend to do with the data*)
3. adequate, relevant and not excessive (*we hold personal data that is sufficient for our purpose and do not hold more information that is needed not only on an individual record level but across ALL the data we hold i.e. the volume of individuals on whom we have personal information*)
4. accurate and up to date (*we consider if it is necessary to update the data; take reasonable steps to ensure the accuracy of the data and ensure that we are clear on the source of the personal information*)
5. not kept for longer than is necessary (*we review the duration for which we keep the data; consider the purpose/s for which we hold the information; the retention of that data and securely delete any information that is no longer required*)
6. processed in line with the rights of individuals (*individuals have a right to access a copy of their "personal data" and a right to object to data being sought or retained in certain circumstances*)
7. secure (*all steps must be taken to ensure the data isn't accidentally or deliberately compromised*)
8. not transferred to other countries without full and proper consideration

(*"Processing" includes obtaining, recording, holding, processing and analysing personal information.*)

What this means in practical terms:

1. You obtain the minimum amount of information necessary; you make the purpose and retention period of that information clear to all individuals and obtain their signed consent to receiving and retaining that information (unless it is not in the public interest to request that consent and it is in the public interest to share it).
2. You ensure that all documentation containing personal information (whether in electronic or paper form) is securely stored. For example lockable cabinets with controlled access to keys or password protected files or separate computer drives/servers.
3. You only share or disclose personal information with those who have an entitlement through the course of their duties. Personal information includes contact details; information obtained via a recruitment or selection process including CRB Disclosure information if relevant; information relating to safeguarding issues to name but a few. For further guidance please refer to the "Information Sharing Protocol of the Catholic Church of England & Wales" available from (INSERT LOCATION).
4. If you are unsure about what information you can share, with whom and in what circumstances you should refer to **(Roman Catholic Diocese of Clifton)** or the Catholic Safeguarding Advisory Service (CSAS) for guidance BEFORE sharing any details.
5. You adhere to these requirements whilst in your role and commit to maintain the confidentiality of the information you have been privy to subsequent to leaving the role.

Confidentiality Agreement

(For use by anyone undertaking a role – paid or unpaid - within the Catholic Church that means they will be obtaining; receiving; handling or storing personal and/or sensitive information)

- I understand that in the course of my role as (_____)
I will have access to personal and/or sensitive information.
- I confirm that I will only request; access or share personal and/or sensitive information that is necessary and relevant to the role I undertake.
- I will not share personal and/or sensitive information with those who have no entitlement to receive such information.
- I confirm that I will only disclose or share such information with the **(Diocesan Safeguarding Office; Religious Order/Congregation Leader; authorised personnel of the Catholic Charity)**.
- I will not disclose any information outside of the recognised Safeguarding/Line Management structure without the signed and written consent of the individual about whom the information relates.
- I will ensure that all personal and/or sensitive information is securely stored either in lockable cabinets (in approved organisation premises i.e. presbytery) or on secure IT arrangement (for example NOT on portable memory sticks).
- If I should be uncertain about with whom or in what circumstances I can release or share information, I will seek guidance from the **(Diocesan Safeguarding Office; Religious Order; Catholic Charity)** or CSAS **before** releasing any information.
- I acknowledge that I am obligated to respect the Confidentiality Agreement terms both whilst undertaking this role and in the future, should I cease to have this role.
- In the event that I believe personal information has been accessed by unauthorised persons I will report this immediately to **(Diocesan Safeguarding Office in the Roman Catholic Diocese of Clifton)**.
- In the event that I knowingly breach the terms of this Agreement I understand that I may be subject to disciplinary action or removed from my role *(dependent on the employed or voluntary nature of the role)*.

Signed: _____

Name: _____
(Block Capitals)

Date: _____

(Parish of St Lawrence and St Paul in the Roman Catholic Diocese of Clifton)
