



Confidentiality Policy

1. Introduction

- All Ayrshire Tigers PFC SCIO (herein referred to as “the club”) members, employees and volunteers are subject to the rules in the Club Constitution and Rules and all related policies and any amendments thereto and any regulations or decisions made by the Board of Trustees.
- All officials appointed to any position within the club will have access to and become aware of information which is confidential.
- All charity officials will undertake to use their best endeavours to prevent the unauthorised publication or disclosure of any such confidential information. This restriction shall continue to apply after the termination of any appointment without limit in point of time.

2. Confidentiality

- As all Trustees will be working closely with personal information in and out of any meetings, confidentiality, professionalism and integrity are critical to the relationship with members of the club.
- It is not appropriate to discuss a person’s sexuality (i.e. ‘outing’ a gay person) without their prior consent.
- Members should avoid talking about any member of the club in a social setting.
- Information given to employees or volunteers acting on behalf of the club is considered to be given to us as the club rather than to the individual employee or volunteer. In order to give the best possible service to users of the club services, it is sometimes desirable to share information with other members.
- Where there is a legal duty on the club to disclose information, the person to whom the confidentiality is owed will be informed that disclosure has or will be made.
- For the purposes of this policy confidentiality shall include, but shall not be limited to the following where officials.
 - a) Must not disclose any information of a confidential nature relating to the club or any member or in respect of which the club owes an obligation of confidence to a third part during or after any appointment except in the proper course of the appointment or as required by law.
 - b) Must not during the course of any involvement with the club or a member, bring the club or any member into any form of disrepute
 - c) Must not remove any documents or tangible items, which belong to the club or a member, or which contain any confidential information from the club’s premises at any time without permission.



- d) Must return to the club or a member upon request and in any event upon the termination of any appointment all documents and tangible items which belong to the club or which contain or refer to any confidential information and which are in your possession or under your control.
- e) Must, if requested by the club delete all confidential information from any re-usable material and destroy all other documents and tangible items which contain or refer to any confidential information and which are in your possession or under your control.
- f) Must understand that access to all confidential information is granted on a need to know basis. Need to know is defined as information access that is required in order to for you to perform in your role.

3. Access to information

- Information is confidential to the club but may be passed to coaches, volunteers or trustees to ensure the best quality service for members.
- Members may see the club records held in their name or that of the club. The request must be in writing to the Club Secretary* giving 14 days' notice and be signed by the individual, or in the case of the club's records, by the Chair of the club.
- When photocopying or working on confidential documents, club officials must ensure they are not seen by people in passing. This also applies to information on computer screens.

4. Storing information

- The club keeps non-confidential information using paper files and computers. Confidential information is maintained with an appropriate level of security, in accordance with the Club's Data Protection Policy and this policy, which will adequately protect information about individuals that is held in the systems.
- Information about volunteers and other individuals will be kept by the club official directly responsible.

5. Duty to disclose information

- There is a legal duty to disclose certain information including: Child abuse, drug use, money laundering, which should be disclosed to the police.
- In addition if a member believes an illegal act has taken place, or that a player is at risk of harming themselves or others, they must report this to the Club Chair who will report it to the appropriate authorities.

6. Disclosures

- Disclosure Scotland helps employers make safer decisions when they're recruiting people. It also makes sure unsuitable people don't work with vulnerable groups, including children. Disclosure Scotland manages the Protecting Vulnerable Groups (PVG) Scheme. This is a membership scheme for people who work with children or vulnerable adults. Employers can check a member's record at any time to make sure they're still safe to work with these groups.



- The club complies fully with the Disclosure (Scotland) Act (July 2020) regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.
- Disclosure information is always kept separately from a player's personnel file in secure storage with access limited to those who are entitled to see it as part of their duties. It is a criminal offence to pass this information to anyone who is not entitled to receive it.
- Documents will be kept for a year and then destroyed by secure means. Photocopies will not be kept. However, the club may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, and the unique reference number of the Disclosure and the details of the recruitment decision taken.

7. Data Protection Act

- The EU General Data Protection Regulations (GDPR) now form part of the data protection regime in the UK, together with the new Data Protection Act 2018 (DPA 2018). When the UK leaves the EU after the transition period the GDPR will be retained in domestic law, but the UK will have the independence to keep the framework under review.
- Information about individuals, whether on computer or on paper, falls within the scope of the Data Protection Act 2018 and must comply with the data protection principles. These are that personal data must be:
 - a) Obtained and processed fairly and lawfully.
 - b) Held only for specified purposes.
 - c) Adequate, relevant and not excessive.
 - d) Accurate and up to date.
 - e) Not kept longer than necessary.
 - f) Processed in accordance with the Act.
 - g) Kept secure and protected.
 - h) Not transferred out of Europe.

8. Breach of confidentiality

- Club members, employees or volunteers who are dissatisfied with the conduct or actions of other members or the club should raise this with the Club Secretary using the club's complaints/grievance procedure, if necessary, and not discuss their dissatisfaction outside of the club.
- Colleagues accessing unauthorised files or breaching confidentiality will face disciplinary action. Ex-employees breaching confidentiality may face legal action.
- The club reserve the right to escalate to a disciplinary process as result of any apparent breach of this confidentiality policy or all relevant rules, paragraphs and sub paragraphs of the Club Constitution supplementary and playing rules, standing orders, protection policies and all related policies, disciplinary procedures and any amendments thereto



8. Whistle-blowing

- Where a club official, player, employee or volunteer has concerns about any wrong doing within the club i.e. the use of the club's funds, he or she may refer directly to the Club Secretary outside the usual complaints procedure. Please refer to the Club's whistleblowing policy.

This policy is to be read in conjunction with the following policies/documents:

- Data Protection Policy
- Social Media Policy
- Whistle-blowing Policy
- IComplaints Policy

S Niven

Stuart Niven
Chairperson

23.07.2020