

CONFIDENTIALITY POLICY

This is a core policy that forms part of the induction for all staff, volunteers and Trustees. It is a requirement that all members have access to this policy and sign to say they have read and understood its contents.

Owner:	Circomedia
Author:	Operations and Academic Teams
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This policy will be reviewed and ratified at least annually and/or following any updates to national and local guidance.

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Confidentiality Policy

1. Purpose

Circomedia recognizes the importance of maintaining the confidentiality of various types of information to safeguard the interests of the organization, its employees, and stakeholders. This Confidentiality Policy aims to establish a framework for handling generic confidential information related to business operations while deferring specific guidelines on personal data to the Data Protection (DP) Policy and, when applicable, referencing the Safeguarding policies and associated procedures.

2. Scope

This policy applies to all employees, contractors, volunteers, students and any other individuals associated with Circomedia who have access to confidential information.

3. Generic Confidential Information

Circomedia considers the following types of information as generic confidential information:

- Business plans and strategies
- Financial information
- Intellectual property
- Marketing plans and materials
- Operational processes and procedures
- Vendor and supplier information
- Technology and software-related information

4. Handling of Generic Confidential Information

4.1 Access: Only authorized personnel with a legitimate need may access generic confidential information.

4.2 Storage: All physical and electronic storage of confidential information must be secure and restricted to authorized personnel.

4.3 Transmission: Confidential information should be transmitted securely, following established protocols.

4.4 Disposal: When no longer needed, confidential information should be securely disposed of in accordance with Circomedia's data disposal procedures.

5. Personal Data

5.1 Data Protection Policy: Personal data, including but not limited to information about employees, students, customers, and partners, will be handled in accordance with Circomedia's Data Protection Policy.

5.2 Safeguarding Policies: Where applicable, confidentiality pertaining to personal data, especially sensitive information related to vulnerable individuals, will also align with the organization's Safeguarding policies and associated procedures.

6. Confidentiality Agreement

All individuals associated with Circomedia, including employees, contractors, and volunteers, are required to sign a confidentiality agreement acknowledging their understanding of and commitment to upholding the confidentiality of information as outlined in this policy.

7. Reporting Violations

Any suspected or actual breaches of this confidentiality policy must be reported promptly to the designated authority within Circomedia. Violations may result in disciplinary action, legal action, or both.

8. Review and Revision

This Confidentiality Policy will be regularly reviewed and updated as needed to ensure its continued effectiveness and relevance. Changes will be communicated to all relevant stakeholders.

9. Compliance

Failure to comply with this Confidentiality Policy may result in disciplinary action, termination of employment or contract, and legal consequences, as deemed appropriate by Circomedia.