



Palpung Changchub Dargyeling

Tibetan Buddhist Meditation Centre

8

Palpung Maitri House

House of Friendship Community Venue

Updated 13/10/2022

Confidentiality Policy

Palpung Changchub Dargyeling (Palpung Wales) will not share confidential information about people who use its services, visit the centre or volunteer for/are employed by Palpung Wales with others outside of Palpung Wales, unless there is a legal or statutory duty to do so. Within Palpung Wales confidential information will only be shared on a strict "need to know" basis.

It is a requirement that every individual involved in the delivery of activities/services with the Meditation centre and Maitri House undertakes that she/he will not divulge, either to any individual or organisation, any confidential information acquired in the course of his/her work, unless there is a legal or statutory duty to do so such as between relevant agencies in relationship to vulnerable and child safeguarding issues.

Guidance on this will be provided to those volunteers and staff who are the direct responsibility of Palpung Changchub Dargyeling.

It is essential that any groups using either premises to provide services has a policy on confidentiality that is approved by Palpung Changchub Dargyeling prior to the start of any services being provided from its premises.

\bigcirc

General about the policy

Scope

This policy affects all employees, including board members, investors, contractors and volunteers, who may have access to confidential information.

Policy elements

Confidential information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Customers/Partners
- Customer lists (existing and prospective)
- Data entrusted to our company by external parties
- Documents and processes explicitly marked as confidential
- Unpublished goals and initiatives marked as confidential

Employees and volunteers may have various levels of authorized access to confidential information.

What employees should do:

- Lock or secure confidential information at all times
- Shred confidential documents when they're no longer needed
- Make sure they only view confidential information on secure devices
- Only disclose information to other employees or volunteers when it's necessary and authorized
- Keep confidential documents inside our company's premises unless it's absolutely necessary to move them

What employees shouldn't do:

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of our charity
- Replicate confidential documents and files and store them on insecure devices

When employees or volunteers stop working for the charity, they're obliged to return any confidential files and delete them from their personal devices.

Confidentiality Measures

We'll take measures to ensure that confidential information is well protected. We'll:

- Store and lock paper documents
- Encrypt electronic information and safeguard databases
- Ask for authorization by management to allow volunteers to access certain confidential information

Exceptions

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

• If a regulatory body requests it as part of an investigation or audit

We're bound to avoid disclosing more information than needed.

Disciplinary Consequences

Employees or volunteers who don't respect our confidentiality policy will face disciplinary action.

We'll investigate every breach of this policy. We'll terminate any employment or volunteer agreement of anyone who wilfully or regularly breaches our confidentiality guidelines for personal profit. We take seriously and examine carefully any unintentional breach of this policy depending on its frequency and seriousness. We'll terminate employees who repeatedly disregard this policy, even when they do so unintentionally.

This policy is binding even after separation of employment.

Keeping and Storing the Personal Data at Palpung Wales / Palpung Maitri House

We'll store any data that contains personal information either in a lockable cabinet or on an electronic device which is password protected.

Who has access to the data

Centre Manager has the access to all the data and residential volunteers will be given access to the data that is important considering their job description.

Personal information (name, contact details) collected in visitor forms are kept maximum of 3 years, after which it will be shredded, and electronic one deleted from the storage / device.

Other personal information, retreats questionnaires, volunteer questionnaires, references, complaints and other notes made in HR meetings are kept maximum of 6 years, after which it is deleted from electronic devices / storage as well as paper files by shredding.

Photos

When people attend a private event like a course, retreat or a community day, we will inform people when taking photos and ask their permission to post it to social media or use it in the Centre's publicity in other ways.

There is not a time limit how long the Centre will keep the photos as they are part of the Centre's history and not personal information.

Should someone request their photo to be removed from the website / social media, we will do so.