

PROCEDURE – Confidentiality

Procedure Title	Country Education Foundation Confidentiality Procedure
Procedure Number	Governance 2.003
Version Number	2
Originally Approved	3/9/2019
Last Approved	21/11/2022
Next Review Date	21/11/2025
Policy Officer	Operations Manager
Responsible Person/s	Chief Executive Officer
Scope	CEF board, staff and volunteers.
Purpose	Country Education Foundation of Australia Pty Ltd ACN 103 889 452 (CEF) considers information confidential and proprietary if it is <i>undisclosed, valuable, expensive, given in confidence and/or not easily replicated</i> .
PROCEDURE	

1. Definition

1.1. Information that is classed as confidential includes but is not limited to:

1.1.1. stakeholder data;

1.1.2. trade secrets;

1.1.3. private deals;

1.1.4. unpublished financial information;

1.1.5. processes, methods and know-how;

1.1.6. specific, undisclosed marketing strategies or tactics;

1.1.7. unpublished goals, forecasts or initiatives that are marked as confidential;

1.1.8. data entrusted to cef by external parties;

1.1.9. documents, processes or other elements explicitly marked as confidential; and

1.1.10. any other knowledge acquired by employees during their employment that could be considered private and confidential.

2. Personal Responsibility

- 2.1. In the course of their employment, employees and volunteers will have various levels of authorised access to confidential information to best conduct their business. When they do so, the following rules apply:
- 2.1.1. no information will be disseminated to anyone outside of CEF without consent from the CEO;
 - 2.1.2. the disclosure of information inside CEF will be limited to those with authorised access and legitimate reason to require that information for the completion of their job responsibilities;
 - 2.1.3. the information will not be used for the personal benefit or profit of the employee or any other person or entity except CEF;
 - 2.1.4. the employee will have access only to the information required to perform their job;
 - 2.1.5. employees must limit the occasions when they take confidential information out of the office;
 - 2.1.6. when perusing or sharing information through electronic means, all precautionary safety measures must be in effect;
 - 2.1.7. confidential information must not be left unattended or unlocked;
 - 2.1.8. unauthorised replication of information is prohibited;
 - 2.1.9. all copies of confidential documents must be shredded when no longer needed; and
 - 2.1.10. upon separation from cef, all confidential information must be returned or deleted from the employee's electronic devices.

3. CEF's Responsibility

- 3.1. CEF will take measures to ensure that confidential information is well protected. Those measures include but are not limited to:
- 3.1.1. electronic information will be encrypted;
 - 3.1.2. databases will be protected with all available security measures;
 - 3.1.3. sensitive paper documents will be identifiable, safely stored and locked;
 - 3.1.4. secure document destruction will be available; and
 - 3.1.5. authorisation of access to both paper and electronic files will be carefully controlled, usually by senior management.
- 3.2. confidential information as described above may occasionally have to be disclosed for legitimate reasons. For example upon request of a regulatory body or for business purposes. In such cases, a strict procedure must be followed that includes the explicit consent of the parties involved (unless the parties involved are faced with criminal charges and CEF is required to disclose this information by law) and the disclosure of only relevant information and no more.

4. Disciplinary Consequences

- 4.1. CEF places great importance in this policy. Any non-conformity will bring about disciplinary and, possibly, legal action.

- 4.2. CEF is prepared to terminate any employee who willfully breaches confidentiality guidelines for personal profit. Serious offenses such as theft of information, illegal disclosure of sensitive data etc. will be grounds for dismissal and may also involve legal consequences.
- 4.3. Any unintentional breach of this policy and procedure will be thoroughly investigated and will be dealt with appropriately depending on its magnitude and seriousness.
- 4.4. This policy and procedure is binding for all stakeholders even after separation from CEF.

5. Record of Amendments

Amendments	Section	Date	Name	Approved
none	n/a	21/11/22	Xanthe Long	yes