



## Confidentiality Policy

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### **Introduction and Purpose**

The purpose of the Confidentiality Policy is to provide staff, consultants and clients with the organisation's understanding of confidentiality, clear guidelines regarding handling of confidential information, to prescribe limits of behaviour and assign responsibilities.

Broadline Group reserves the right to change the policy and to expect adherence to the changed policy. Areas not specifically covered by these policies shall be determined by the Management.

Confidentiality is central and integral part of the organisation, it offers safety and privacy. Information given is held in strict confidence and in line with Data Protection Acts.

This policy should be read in conjunction with our Data Protection Policy and Access Request Policy.

### **Specific Responsibilities**

Broadline Group collects and uses information for the following purposes:

- to undertake advertising, marketing, direct recruitment and public relations exercises.
- to meet insurance policy requirements.
- to provide personnel, payroll and pension administration services.
- to update databases within the Broadline Group.
- to enhance or improve service users experience of services.
- to provide online resources and services.
- to recruit and select staff for available positions.
- to provide screening services, including Garda Vetting.
- to provide training and support services

### **Definition and principles of confidentiality**

All information that:



- is or has been obtained during, or in the course of involvement, or has otherwise been acquired in trust due to involvement with the organisation,
- relates particularly to the organisation's business, clients or that of other persons or bodies with whom we have dealings of any sort, and
- has not been made public by, or with our authority, is confidential, and (save in the course of our business or as required by law) an employee/ consultant /service user shall not at any time, whether before or after the end of their involvement, disclose such information in any form to any person without our written consent.

Employees/Consultants are expected to exercise care to keep safe all documentary or other material containing confidential information, and at the time of end of an individual's involvement with the organisation, or at any other time upon demand, return to the organisation any such material in their possession. The Employee /consultant undertakes and agrees that all such confidential information is the exclusive property of the Company.

Information held by the organisation and not independently available to a third party cannot be disclosed without the individual's written consent and without the prior written consent of a duly authorised officer of the Company.

### **Data Protection Responsibilities**

In addition to the duty of care regarding Confidentiality outlined above, the Data Protection Acts imposes legal obligations on the Broadline Group, its staff and consultants.

The Broadline Group takes seriously its responsibilities under the Data Protection Acts. The organisation is aware of and acts in accordance with the following eight Data Protection principles regarding information:

1. Obtain and process information fairly
2. Keep it only for one or more specified, explicit and lawful purposes
3. Use and disclose information only in ways compatible with these purposes
4. Keep it safe and secure
5. Keep it accurate, complete and up-to-date
6. Ensure it is adequate, relevant and not excessive
7. Retain for no longer than is necessary
8. Allow individual's access to their personal data, on request



The Broadline Group Data Protection Policy outlines our Data protection practices and procedures and is available on request from your Manager.

### **Wrongful disclosure**

Wrongful disclosure can occur in at least two ways. It can be by either act or omission. The first would be where confidential information is deliberately passed on to a third party. The second would be where confidential information is disclosed to a third party through negligence. Wrongful disclosure will be considered as an act of gross misconduct. Any breach of this agreement could result in disciplinary action up to and including dismissal, and/or a claim for breach of Contract.

In the case of consultants working on behalf of the hotel this would result in termination of your service contract.

### **Policy Feedback and Review**

Constructive feedback on this Policy is always welcome. It must be given to Group HR Manager who will ensure that the Management considers it.