

# Scottish Pétanque Association



## Confidentiality Policy

### 1. Purpose

The Scottish Pétanque Association (SPA) is committed to maintaining high standards of integrity, trust, and professionalism. This Confidentiality Policy sets out the expectations and obligations placed on individuals acting on behalf of the SPA in relation to confidential and sensitive information.

The policy is intended to ensure that such information is handled appropriately, lawfully, and consistently, and to protect the interests of members, players, officials, volunteers, and the SPA as an organisation.

### 2. Relationship to the SPA Privacy Policy

This Confidentiality Policy is distinct from, and complementary to, the SPA Privacy Policy.

The SPA Privacy Policy explains how the SPA, as an organisation, lawfully collects, processes, stores, shares, and retains personal data, and sets out the rights of individuals under data protection legislation.

This Confidentiality Policy sets out the personal responsibilities and behavioural expectations of individuals acting on behalf of the SPA when they access confidential or sensitive information, whether or not that information constitutes personal data.

Compliance with the SPA Privacy Policy does not remove the obligation to comply with this Confidentiality Policy.

### **3. Scope**

This policy applies to any individual who, through their role or activities with the SPA, has access to confidential or sensitive information. This includes, but is not limited to:

- SPA NEC members and office bearers
- Members of SPA commissions, panels, and working groups
- Selectors, coaches, managers, and officials
- Disciplinary, complaints, and safeguarding panel members
- Volunteers, contractors, or consultants engaged by the SPA

### **4. Definition of Confidential Information**

Confidential Information includes any information that is not publicly available and which is obtained through an individual's involvement with the SPA. This includes, but is not limited to:

- Personal data relating to members, players, officials, volunteers, or staff
- Selection discussions, assessments, deliberations, and outcomes
- Disciplinary, complaints, safeguarding, or welfare-related information
- Medical, eligibility, PVG, or safeguarding-related information
- Internal correspondence, reports, minutes marked confidential, and draft documents
- Information received from external bodies such as CEP, FIPJP, or other national federations

Confidential Information may be held in written, electronic, verbal, visual, or any other form.

### **5. Principles of Confidentiality**

Individuals covered by this policy must:

- Treat all confidential information with care, discretion, and respect
- Access only the information necessary to perform their role
- Use confidential information solely for legitimate SPA purposes
- Ensure that confidential information is not disclosed, intentionally or unintentionally, to unauthorised persons

## **6. Handling and Security of Information**

Individuals must take all reasonable steps to ensure that confidential information is kept secure. This includes:

- Secure storage of paper and electronic records
- Use of password protection and secure devices where appropriate
- Avoiding discussion of confidential matters in public or inappropriate settings
- Ensuring confidential documents are not left unattended or shared improperly

## **7. Disclosure of Information**

Confidential information must not be disclosed to third parties unless:

- Disclosure is authorised by the SPA
- Disclosure is required by law or by a regulatory or safeguarding authority
- Disclosure is necessary for legitimate SPA business and is compliant with data protection principles

Where information is shared externally, it must be limited to what is necessary and appropriate.

## **8. Data Protection**

Where confidential information includes personal data, it must be handled in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- SPA Privacy Policy

Individuals must not retain personal data for longer than necessary and must report any actual or suspected data breach without delay.

## **9. Breaches of Confidentiality**

Any actual or suspected breach of confidentiality must be reported promptly to the SPA Secretary or relevant safeguarding or data protection officer.

A breach of this policy may result in disciplinary action under SPA procedures, removal from role, and, where appropriate, referral to external authorities.

## **10. Duration of Obligations**

The obligations under this policy apply throughout an individual's involvement with the SPA and continue after the individual has left their role, for as long as the information remains confidential.

## **11. Governance and Review**

This policy is approved by the SPA National Executive Committee and will be reviewed periodically, or sooner if required by changes in legislation or SPA governance arrangements.

**Approved for release by Scottish Petanque Association NEC February 2026**