



BOARD CONFIDENTIALITY POLICY

1. Purpose

The purpose of the Whistlewood Common Ltd (WCL) Board Confidentiality Policy is to support effective governance while maintaining an appropriate balance between confidentiality and transparency to members. This will enable vision and the implementation of an effective strategy to achieve that vision, whilst protecting information that is confidential, personal, or related to employment, commercial and legal matters.

2. Principles

The Board is committed to:

- Being as open and transparent as possible with members
whilst
- Protecting information that must remain confidential
and
- Acting in the best interests of the co-operative

3. Policy

3.a Board Members Responsibilities

Board members should keep confidential information that is sensitive in nature, including:

- Personal data
- Employment matters
- Legal or commercially sensitive information

Not all Board information is confidential. Wherever possible, the Board will:

- Share decisions and key information with members
- Provide access to non-sensitive documents, where requested and if considered appropriate.

As a rule maintaining confidentiality of sensitive information will help ensure observance by Board members of the following legal duty:

A Board Member or past Board Member **must not** use information obtained through their role to:

- Gain personal advantage
- Cause harm to the co-operative
- Cause harm to an individual

4. Access to Board Information

Requests for Board documents will be considered on a case by case, taking into account:

- The co-operative's commitment to transparency
- Legal and privacy obligations
- The legitimate interests of members

Requests for Board documents should be made to the Chair who should include consideration of the request as an item on the Board Agenda.

When a request is made consideration will be given to the requirements outlined in the UK General Data Protection Regulations (GDPR) and the Data Protection Act (2018) when considering what is appropriate to share.

The Secretary will ensure that Board Papers containing sensitive information are created, maintained and distributed in a manner which is consistent with their confidential status. They shall be kept separately from non-confidential information where-ever possible.

This policy does not prevent the organisation from complying with its legal obligations including responding to Subject Access Requests under Data Protection law.

5. External Advice

The Board may share confidential information with professional advisers where necessary to assist the board in carrying out its functions effectively