

# Confidentiality Policy

## Introduction

Agreement to the principle of confidentiality and this Policy is a condition of membership of the Committee and all new members are required to sign a statement to this effect on appointment.

Confidentiality is a principle of the Values and Behaviours and any breach of this policy therefore constitutes a breach of the Code of Conduct. A member may be removed from the Committee if an investigation determines that, on the balance of probabilities, they have disclosed confidential information and that this was intentional.

## Aim

The aim of this policy is to ensure that all Committee members understand their duties in respect of confidentiality and the arrangements in place to enable this to best support the work of CPE and the long-term success of community pharmacy in England. A breach of confidentiality risks loss of trust amongst members and the wider sector, reputational damage and legal challenge.

## Principle of Confidentiality

Members of the CPE Committee will have access to confidential information and material in order to carry out their role. They must respect and adhere to the confidential status of such information and material, and not divulge or otherwise share with any individual or group without permission of the Chief Executive.

## Arrangements

The Chief Executive will determine if an item is confidential. Reasons for confidentiality include but are not limited to market sensitivity, patient or other third-party confidentiality, DHSC requirement and negotiation effectiveness. Any confidential material should be clearly identified in agendas and papers and during discussions as such with the reason for confidentiality stated and any time limits for this explained (eg until negotiations conclude or a report is



published). Where an agenda item is marked as confidential, all papers and discussions related to the item must be treated as being confidential, even if not specifically marked. Members will be informed if the confidential status of information changes.

Even where material is not marked as confidential, members should use their professional judgement, knowledge and experience to determine the confidential status of information and how it may be treated.

Detail of Committee discussions (beyond the published report of each meeting), including opinions expressed by individual members and how members voted on specific issues, are also confidential and should not be disclosed by anyone other than the individual member.

Committee members must not disclose or share confidential information with any individual or group, including a body nominating or electing the member to CPE, an employer or other stakeholder or publicly, unless specifically agreed otherwise. This includes the sharing of information via email or posing on social media, including WhatsApp.

Committee members must inform the Chief Executive immediately if they become aware of or suspect that confidential information is being disclosed by a Committee member via any means in breach of this Policy. Members must also support any subsequent investigation of a suspected breach as required.

Any questions regarding the confidential status of information and whether it can be disclosed, or for permission to disclose, should be addressed to the Chief Executive.

### **More information**

Please contact Gordon Hockey, Director, Legal, for further information regarding this Policy.