



# Face Front Inclusive Theatre

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## Confidentiality Policy

Face Front Inclusive Theatre (FFIT/ Face Front) recognises that colleagues (employees, volunteers and trustees) gain information about individuals and organisations during the course of their work or activities. In most cases such information will not be stated as confidential and colleagues may have to exercise common sense and discretion in identifying whether information is expected to be confidential. This policy aims to give guidance but if in doubt, seek advice from your line manager.

### General Principles

- Colleagues are able to share information with their line manager in order to discuss issues and seek advice.
- Colleagues will avoid exchanging personal information or comments about individuals with whom they have a professional relationship.
- Talking about the private life of a colleague is to be avoided at all times, unless the colleague in question has instigated the conversation.
- Colleagues will avoid talking about organisations or individuals in social settings.
- Colleagues will not disclose to anyone, other than their line manager, any information considered sensitive, personal, financial or private without the knowledge or consent of the individual, or an officer, in the case of an organisation.
- There may be circumstances where colleagues would want to discuss difficult situations with each other to gain a wider perspective on how to approach a problem. Face Front's consent must be sought before discussing the situation, unless the colleague is convinced beyond doubt that the organisation would not object to this. Alternatively, a discussion may take place with names or identifying information remaining confidential.
- Where there is a legal duty on Face Front to disclose information, the person to whom the confidentiality is owed will be informed that disclosure has or will be made.
- Most information held by Face Front relates to individuals, voluntary and community organisations, volunteers, employees, trustees or services which support or fund them.

### Why information is held

- Most information held by Face Front relates to individuals, voluntary and community organisations, volunteers, employees, trustees or services which support or fund them.
- Information is kept to enable Face Front colleagues to understand the history and activities of individuals or organisations in order to deliver the most appropriate services.

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## Inclusion Through Theatre

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Patrons: Mat Fraser | Josette Bushell-Mingo OBE | Rachel Denning | Doris Jaggie  
Aditya Chakraborty | Onjali Rauf MBE | Joseph Adelakun | Jamie Beddard

Face Front Inclusive Theatre is a company limited by guarantee.  
Registered in England and Wales No.05154096. Registered Charity No.1116506.



@FaceFrontUK



facefronttheatre



Face-Front-Inclusive-Theatre

- Face Front has a role in putting people in touch with voluntary and community organisations and keeps contact details which are passed on to any enquirer, except where the group or organisation expressly requests that the details remain confidential.
- Information about ethnicity and disability of users is kept for the purposes of monitoring our equal opportunities policy and also for reporting back to funders.

### **Access to information**

- Information is confidential to Face Front as an organisation and may be passed to colleagues, line managers or trustees to ensure the best quality service for users.
- Where information is sensitive, i.e. it involves disputes or legal issues; it will be confidential to the employee dealing with the case and their line manager. Such information should be clearly labelled 'Confidential' and should state the names of the colleagues entitled to access the information and the name of the individual or group who may request access to the information.
- Users may have sight of Face Front records held in their name or that of their organisation. The request must be in writing to the Chair of Trustees giving 14 days' notice and be signed by the individual, or in the case of an organisation's records, by the Chair or CEO. Sensitive information i.e. it involves disputes or legal issues, will only be made available to the person or organisation named on the file.
- Employees may have sight of their personnel records by giving 14 days' notice in writing to the Chair of Trustees.
- When photocopying or working on confidential documents, colleagues must ensure people passing do not see them. This also applies to information on computer screens.

### **Storing information**

- General non-confidential information about organisations is kept in unlocked filing cabinets and in computer files with open access to all Face Front colleagues.
- Personnel information on employees, volunteers, and other individuals working within Face Front will be kept in lockable filing cabinets.
- Files or filing cabinet drawers bearing confidential information should be labelled 'confidential'.
- In an emergency situation, the Chair of Trustees may gain access or authorise access to files by other people.

### **Duty to disclose information**

- There is a legal duty to disclose some information including:
- Child abuse will be reported to the Social Services Department
- Drug trafficking, money laundering or acts of terrorism will be disclosed to the police.
- In addition colleagues believing an illegal act has taken place, or that a user is at risk of harming themselves or others, must report this to the CEO /Chair of Trustee who will report it to the appropriate authorities.
- Users should be informed of this disclosure.

### **Disclosures**

- Face Front complies fully with the DBS code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the General Data Protection Regulations 2018 and other

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## **Face Front's performing arts groups**

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relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

- Certificate information is to be kept securely, in a lockable, non-portable, storage container with access strictly controlled and limited to those who are entitled to see it as part of their duties.
- Disclosure information is always kept separately from an applicant's personnel file in secure storage with access limited to those who are entitled to see it as part of their duties. It is a criminal offence to pass this information to anyone who is not entitled to receive it.
- Documents will be kept for a year and then destroyed by secure means for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).
- Photocopies will not be kept. However, Face Front may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

### **General Data Protection Regulations**

Information about individuals, whether on computer or on paper, falls within the scope of the General Data Protection Regulations and must comply with the data protection principles.

These are that personal data must be:

- Obtained and processed fairly and lawfully
- Held only for specified purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept longer than necessary
- Processed in accordance with the GDPR
- Kept secure and protected
- Not transferred out of Europe.

### **Breach of confidentiality**

- Employees who are dissatisfied with the conduct or actions of other colleagues or Face Front should raise this with their line manager using the grievance procedure, if necessary, and not discuss their dissatisfaction outside Face Front
- Colleagues accessing unauthorised files or breaching confidentiality may face disciplinary action.

### **Whistleblowing**

- Where the Finance Worker has concerns about the use of Face Front funds, he or she may refer directly to the Chair or Treasurer outside the usual grievance procedure.
- All colleagues hold the right to inform either his or her manager or one of the trustees if they believe that Face Front is being brought into disrepute by the actions of another colleague or trustee.

### **Related Policies and procedures**

This policy should be read alongside our related organisational policies:

Data Protection Policy

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Whistleblowing Policy  
Safeguarding Child and Vulnerable Persons Policy  
Grievance, Disciplinary, Bullying and Harassment Policy

**LAST REVIEWED**

December 2025

**REVIEW**

June 2026

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