

# CONFIDENTIALITY POLICY

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Roles referred to in this document	
HR Rep	BUSINESS OWNER
Business Manager	BUSINESS OWNER

## 1 Policy Brief and Purpose

1.1 Child Centred Play Therapy (“**the Company**”) requires all workers to maintain the confidentiality of all personal and private information about clients/customers, colleagues and the Company. The purpose of this policy is to outline the Company expectations about how confidential information is protected and stored.

## 2 Variation

2.1 This policy does not form part of any worker’s contract of employment or engagement. The Company may vary, replace or terminate this policy from time to time.

## 3 Scope

3.1 This policy applies to all workers of the Company.

3.2 This policy does not replace any legislation or any terms under an applicable modern award or agreement. If any part of this policy is in conflict with the applicable legislation, modern award or agreement, the legislation, modern award or agreement will take precedence.

## 4 Definitions

4.1 “*Worker or workers*” (Please refer to Appendix A for further clarification).

4.2 “*Confidential Information*” means all information, whether or not it is described as confidential, in any form or medium concerning any past, present or future business operations or affairs of the Company or any customer, client, licensee, contractor or supplier of the Company, including but not limited to:

4.2.1 Trade secrets of the Company: and

4.2.2 Information about the business and affairs of the Company such as

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products of the Company, services provided by the Company, financial accounts and reports of the Company and its customers, marketing and strategy plans, client proposals, sales plans, client prospects, information about fees, pricing information, supplier lists, research, financing, inventions, designs, techniques, plans, diagrams, graphs, procedures or processes, security information, sales and training manuals and operational information and methods; and

- 4.2.3 Details of contracts and/or arrangements with third parties including information about customers, suppliers and contact persons of the Company, such as their specific requirements, arrangements and past dealings with the Company; and
- 4.2.4 Customer names and addresses, customer lists, business cards and diaries, calendars or schedules; and
- 4.2.5 All technical and non-technical data, formulae, patterns, programs, devices, methods and research activities, ideas and concepts; and
- 4.2.6 All financial and accounting information, pricing lists, schedules and structures, product margins and financial plans; and
- 4.2.7 Remuneration details and investment outlays; and
- 4.2.8 Intellectual property rights; and
- 4.2.9 Manuals, computer databases and computer software; and
- 4.2.10 All other information obtained from the Company or obtained during the worker's employment or association with the Company, which is by its nature, confidential; and
- 4.2.11 But excludes information which:
  - Has come into the public domain other than by a breach of contract or other unauthorized use or disclosure; or
  - Is requested by a regulatory body; or
  - Is required if the Company is considering a venture or partnership – within legal boundaries.

4.3 “*Authorised Company Representative*” is the person or persons within the Company authorised to deal with matters in accordance with this policy.

4.3.1 HR Rep

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The Authorised Company Representative for matters relating to Human Resources, including all staff related issues.

## 4.3.2 Business Manager

The Authorised Company Representative for overseeing the Company Confidentiality Policy.

The Company may, from time to time, designate a different person or persons to fulfil these roles.

## 5 Detail

### 5.1 Company Responsibilities

5.1.1 The Company will take all reasonable measures to ensure confidential information is well protected by:

- Storing paper documents in secure cabinets in secure locations; and
- Encrypting electronic information and safeguarding databases; and
- Requiring all workers to sign non-compete and/or non-disclosure agreements; and
- Requiring an appropriate level of authorization from within the Company to allow workers to access confidential information.

### 5.2 Worker Responsibilities

5.2.1 Workers must:

- Lock and/or secure confidential information always; and
- Shred confidential information when no longer needed; and
- Ensure confidential information is viewed on secure devices only; and
- Disclose confidential information to other worker's only when necessary and authorized, in writing, by the Company; and
- Keep confidential information within the designated Company premise/s unless otherwise authorized, in writing, by the Company.

5.2.2 Workers must not:

- Use confidential information for any personal benefit or gain, financial or otherwise; and
- Disclose confidential information to anyone outside the Company unless authorized, in writing, by the Company; and
- Replicate confidential documents and files and store them on insecure devices.

5.2.3 When a worker ceases to be employed by the Company, the worker:

- **Must** return to the Company any confidential information, both hard copy files and electronic files kept on the worker's personal device/s and, if applicable, delete any and all electronic files held on the personal device/s.

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- Any Company confidential information must also be removed from the “Trash” or “Deleted” folders of the worker’s device/s and the “Cache” on the worker’s device/s must be cleared.

**Please Note:** In addition to the above, when a worker ceases to be employed by the Company, for whatever reason, the worker’s responsibilities detailed in this policy remain in full force and effect and therefore subject to Clause 6 of this policy.

## 6 Breach of the Confidentiality Policy

6.1 Any worker who is found to have breached this policy will be subject to disciplinary action in accordance with the Company Counselling and Disciplinary Policy, up to and including termination of employment or engagement and, if deemed appropriate by the Company, legal action.

6.2 Any worker who becomes aware of any actual or potential breach or breaches of this policy must report this information to the Business Manager as soon as the worker becomes aware of the breach or potential breach. Failing to report an actual or potential breach may result in disciplinary action in accordance with the Company Counselling and Disciplinary Policy, up to and including termination of employment or engagement.

## 7 Complaints or Grievances

7.1 Should a worker have doubts about any aspect of this policy the worker must seek clarification from the HR Rep.

7.2 Any worker, who in good faith raises a complaint or discloses an alleged breach of this policy, will not be victimised. All reports will be dealt with in a timely and confidential manner, where possible, and in line with the Company Complaints or Grievances (Internal) Policy.

Production of this policy was authorised by Millie Evans on 18/09/2023