



# Mandala Yoga Ashram Confidentiality Policy

## 1. Introduction

The purpose of this Confidentiality Policy is to lay down the principles that must be observed by all who are responsible for the administration and running of Mandala Yoga Ashram (MYA) in relation to person-identifiable information or confidential information. All managers, Ashram team members, visitors, and trustees need to be aware of their responsibilities for safeguarding confidentiality and preserving information security.

Directors, managers, and Ashram team members in the Ashram are bound by a legal duty of confidence to protect personal information they may meet during their work<sup>1</sup>.

## 2. Updated Legal changes

The General Data Protection Regulation (GDPR) has now replaced the previous law on data protection (the Data Protection Act 1998) and gives individuals more rights and protection in how their personal data is used by organisations.

The Ashram's updated **GDPR and Data Protection Policy** (August 2019) updates the previous Ashram Data protection and Confidentiality Policy and Procedures.

MYA collects and stores specific and relevant personal data and is fully aware its responsibility to ensure due vigilance regarding safeguarding this data, and appropriately disposing of it at the right time. MYA will continue to review its systems to stay up to date with new legislation.

Mandala Yoga Ashram is known as the Data Controller under the Act, which means that it determines what purposes personal information held, will be used for.

## 3. Consent

One of the main changes concerns how we obtain consent to receive data. Consent must be given freely, must be specific, informed, unambiguous and be able to be withdrawn at any time.

The process of removing someone's details will be as easy as receiving an email from the person concerned. When asking for consent we will be clear about what this means and what the information will be used for. If someone signs up for the Ashram Newsletter for example, the material will be used for that person alone and no other purpose unless agreement has been obtained beforehand.

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<sup>1</sup> Work . This indicates the day to day activities necessary in the running of MYA

Individuals can ask to see the data that we hold, and we are requested to provide this within a month of the request. If data is wrong, then we will correct this.

Individuals can ask for their information to be erased from our records and can ask for it to be removed immediately. There are some instances where this may not be possible, for example, regarding safeguarding issues. Also, gift aid records cannot be removed for up to six years as this has implications for financial auditing regulations.

Sometimes it may seem that consent is not always appropriate for example the names that appear on the weekly rota list, as it is essential for the smooth running of the ashram on a day to day basis and it is a legitimate activity for the ashram. However, sharing this material outside the Ashram would need to be considered in terms of consent. This may also apply to photographs etc of individuals.

### **Personal conversations with members of the Ashram team**

The nature of the ashram is such that anyone visiting, long or short term, may need to talk to someone in confidence. It is important to us to provide a safe environment for personal conversations. The Director, Manager, Ashram team members, and the trustees undertake to maintain the confidentiality of any such conversations. No details of any confidential conversation will be disclosed to a third party unless:

- There is an immediate risk of harm to self or others (this can include risks from contagious diseases).
- Other Ashram policies have been violated e.g. child protection or adult safeguarding.
- There are allegations of criminal activity or financial impropriety
- There is a complaint about a member of the ashram team, trustees, or a visitor.  
To resolve the complaint, it is likely we will need to discuss it with the person involved.

Information will only be shared in these cases on a 'need to know' basis.

We have procedures for dealing with the above, but we remain committed to the principles of confidentiality and data protection.

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