

## **Abstract**

This study focusses on the duty of confidentiality in international commercial arbitration in the legal systems of England compared with the situation in Tanzania. Although confidentiality is one of the essential features of arbitration, confidentiality in arbitration is not always guaranteed and its status brings problems in different countries. Therefore, the author critically analyses the extent to which the duty of confidentiality in international commercial arbitration is applied in various countries, particularly in England and Tanzania. In so doing, decided cases, various institutional rules for arbitration are also reviewed for their treatment of confidentiality. These countries have been chosen because they share a common legal system, that is, common law.