

Hainworth Wood Community Centre

Confidentiality Policy

Information that is shared with HWCC about other organisations and individuals will be treated with respect, as confidential, and not be divulged to others without consent from the organisation or individual concerned.

1. General Principles

1.1 HWCC recognises that employees, volunteers, trustees, and students 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.

1.2 Colleagues are able to share information with their line manager in order to discuss issues and seek advice.

1.3 Colleagues should avoid exchanging personal information or comments (gossip) about individuals with whom they have a professional relationship.

1.4 It is not appropriate to discuss a persons sexuality (i.e. 'outing' a gay person) without their prior consent.

1.5 Colleagues should avoid talking about organisations or individuals in social settings.

1.6 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.

1.7 There may be circumstance where colleagues would want to discuss difficult situations with each other to gain a wider perspective on how to approach the problem. The organisations 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.

1.8 Where there is a legal duty on HWCC to disclose information, the person to whom the confidentiality is owed will be informed that disclosure has or will be made.

2. Why Information Is Held

2.1 Most information held by HWCC relates to residents, voluntary and community organisations, volunteers, students, trustees or services which support or fund them.

2.2 Information is kept to enable HWCC to understand the history and activities of organisations and residents to enable us to deliver the most appropriate services.

2.3 Information about ethnicity and disability of users is kept for the purposes of monitoring our equal opportunity policy and also for reporting back to funders.

2.4 Information relating to service users is kept for the purpose of relating back to funders.

3 Access To Information

3.1 Information is confidential to HWCC as an organisation and may be passed on to colleagues, line managers or trustees to ensure best quality service for users.

3.2 Where information is sensitive, it will be labelled confidential and kept securely, marked confidential, and be unavailable for most staff.

3.3 Users can have sight of their records by speaking to the centre manager.

4 Storing Information

4.1 General non-confidential information is kept in an unlocked filing cabinet with open access to staff, volunteers and trustees.

4.2 Information about groups, volunteers, and students will be kept in the centre managers office.

4.3 Files and filing cabinet drawers bearing confidential information should be labelled confidential.

4.4 In an emergency, the Chair may authorise access to files by others.

5 Duty To Disclose Information

5.1 There is a legal duty to disclose some information including:

5.1.1 Child abuse will be reported to the social Services Dept

5.1.2 Drug trafficking, money laundering, acts of terrorism or treason will be disclosed to the police.

5.2 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 Centre Manager who will report it to the appropriate authorities.

5.3 Users should be informed of this disclosure.

6 Disclosures

6.1 HWCC complies fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.

6.2 Disclosure information is always kept separately from applicant personell 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.

6.3 Documents will be kept for a year and then destroyed by secure means. Photocopies will not be kept. However, HWCC may keep a record of the date of issue of the 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.

7 Data Protection Act

7.1 Information regarding individuals, whether on computer or on paper, falls within the scope of the Data Protection Act and must comply with the data protection principles. These are that personal data must be:

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

8 Breach of Confidentiality

8.1 Employees who are dissatisfied with the conduct or actions of other colleagues or HWCC should raise this with their line manager using the grievance procedure, if necessary, and not discuss their dissatisfaction outside HWCC.

8.2 Colleagues accessing unauthorised files or breaching confidentiality may face disciplinary action. Ex-employees breaching confidentiality may face legal action.

9 Whistleblowing

9.1 Where the treasurer has concerns about the use of HWCC funds, he or she may refer directly to the Chair outside the usual grievance procedures.

Guidance

1 Written Information

- **Information about peoples name and contact details should not be displayed or left lying about in public areas without their prior consent for this information to be made public. This is particularly important in relation to individual service users: personal information about applications for positions at HWCC; financial information; information about employees, volunteers, students or organisations we work with.**
- **Confidential information should be securely locked away.**
- **When photocopying or working with confidential documents, colleagues must ensure they are not seen by people in passing. This also applies to information on computer screens.**
- **Case work information and ongoing correspondence/notes should be kept confidential. Care should be taken in offices where meetings take place with other groups. Case notes should not be left on desks. This includes case study reports, which if seen by other voluntary/ community groups could reveal sensitive information**
- **Keep names and addresses separately from case notes.**

- **Anything that contains sensitive or personal information, and is no longer needed, should be carefully disposed of, using the shredder. HWCC encourages the use of recycled paper but make sure that you are not, inadvertently, using something that has information on the back that others should not see.**

2 Information Given Verbally

- **Personal contact details of service users, volunteers, students, or trustees must not be passed on to a third party without prior consent- this includes mobile phone numbers and email addresses.**
- **Contact details of another organisation should only be given with prior consent.**
- **Personal messages should not be left with a third party- take care when leaving a message on an answer machine.**
- **Precautions need to be taken when using call return or caller display.**
- **Although examples of good/bad practice can help inform development work, anecdotal information about groups and development work should be used with care, ensuring that groups are not named and cannot be identified. There is a risk of damage to a group reputation and undermining confidence in the service.**
- **Refrain from making information public that could identify a colleague or client.**

3 IT

- **Email should never be used for confidential or sensitive correspondence/ material. Email is not a secure method of communication and your email may be forwarded onto others without your consent or knowledge. It is good practice to separate business and personal correspondence even to the same contact. For example you could send one email to congratulate a contact on the birth of her new baby and another to arrange your next meeting.**
- **Remote access to email at home, external organisation or public facility should be used only when confidentiality can be maintained. Care should be taken to ensure that access is not granted to other organisations/individuals/family members. For example, avoid being overlooked when entering password. Ensure log out is successful before leaving the computer. Ensure that the computer will not remember your password when entering on a remote system.**
- **Consider using log off facility when going for lunch, etc.**
- **Visitors to HWCC should be supervised at all times. Do not allow visitors to use computers/email/desk space without supervision, as accidental or deliberate access to information could compromise confidentiality.**

4 Working With Others

- **All HWCC staff, volunteers, students will respect the confidentiality of others when working outside the organisation. This may include:**
- **Not divulging personal information without consent.**
- **Avoiding becoming drawn into discussion about a third party that could undermine their success or progress, unless absolutely unavoidable or appropriate.**
- **Declaring an interest if necessary/appropriate.**
- **Maintaining loyalty to HWCC.**

5 Personal Information About HWCC Employees, Volunteers, Students, Committee Members, and Service Users

- **All information relating to the above is stored in a locked filing cabinet.**
- **The centre manager has responsibility for this information.**
- **The only people with access to this cabinet are the centre manger and Chair of the Committee.**

Date agreed September 2017