

## **Acts 4 Sharing** CONFIDENTIALITY POLICY

### Statement

**Acts 4 Sharing** has access to information concerning groups and individuals and it is therefore imperative that the strictest confidentiality is maintained at all times. Information belongs to the person or agency entrusting it to **Acts 4 Sharing**. Any information passed on outside of **Acts 4 Sharing** will only be given with the express permission of the person or body which supplied the information unless we are legally obliged to disclose it.

**Acts 4 Sharing** has notified the Information Commissioner's Office under the Data Protection Act that our Administrator is the appointed Data Controller. We endeavour to ensure that all information is stored under their guidelines:

- confidential & sensitive information is kept securely;
- it is fairly & lawfully processed;
- it is accurate & kept up to date;
- it is limited to relevant information & not excessive for its purpose;
- it will not be used for any purpose other than that for which it was given.

### Responsibility

**Acts 4 Sharing** has a responsibility to ensure all staff & volunteers are aware of Data Protection principles & the need for confidentiality, & that they are aware of specific guidelines that may be developed for specialised areas of work.

All members of staff & volunteers in **Acts 4 Sharing** are responsible for ensuring any information they hold or are party to, is handled in line with **Acts 4 Sharing** policies & the Data Protection Act.

All personal records, whether held on paper or electronically are covered by the Data Protection Act & individuals & the organisation have criminal liability if they recklessly disclose personal information. A serious breach would be a disciplinary matter (see the Disciplinary Procedure).

This policy applies to information held about clients, donors, staff, & volunteers.

### Clients

- Information divulged by a Referral Agent will be treated in the utmost confidence & will not be passed on to anyone outside the organisation, except where extenuating circumstances exist (see below).
- From time to time it may be necessary for a member of staff/volunteer to share information with another member of staff/volunteer in order to ascertain the correct procedure to follow regarding a particular referral. If this occurs it must be made absolutely clear beforehand that all people concerned are bound by confidentiality & that confidential matters must not be discussed outside **Acts 4 Sharing**.
- Staff & volunteers will use discretion on the phone if it is necessary for them to seek help from a colleague whilst in the middle of their conversation.

"Acts 4 Sharing" is a registered Charitable Incorporated Organisation with the Charity Commission in England. No. 1158033.

- Access to the clients database (if we create one), will be password protected & will be limited to staff members & certain trained volunteers, upon the agreement of the Administrator.
- Statistics used for the purposes of monitoring or funding applications will be produced in such a way that no individual will be identified by them unless clear prior permission has been given. An explanation of how the information will be used must be given to any person agreeing to be identified.

### Exceptions

In certain circumstances **Acts 4 Sharing** reserves the right to disclose confidential information should this be deemed necessary. Circumstances include:-

- If staff have cause to believe that a client could cause danger to themselves or others.
- If staff have cause to believe that a client is in danger.
- If staff have cause to believe that a crime has been committed.
- If staff have cause to believe that a child or children have been left alone in a property.
- If a member of staff believes that they are in danger, particularly when carrying out a removal in a domestic violence case.

Trustees will be notified if any of the above occur.

In certain circumstances **Acts 4 Sharing** is legally obliged to provide certain information to the police and other agencies without the individuals consent.

### Donors

- Members of the public who donate furniture, household items, clothes, toys etc. to **Acts 4 Sharing** will be asked to provide their name, address & contact telephone number only for the purpose of carrying out the collection. Whilst the details will be kept for the purposes of recording the amounts collected, personal details will be destroyed once the collection has taken place.

### Staff

- Personal details of staff members will be kept securely & access only available to the CEO, Administrator & trustees. No information will be passed to a third party without the permission of the particular staff or ex-staff member.
- Staff will have access to their own records at any time. If a member of staff wishes to access their personnel records they should ask the Administrator. References will only be disclosed if permission has been given by the referee.

### Volunteers

- Personal details of volunteers will only be accessible to the CEO, Administrator & trustees.
- Volunteer details and/or photos for publicity purposes or funding returns will only be used with the written agreement of the volunteer concerned.
- Occasionally it may be necessary to share volunteer details with various staff members to ensure adequate supervision or for training purposes.

- Volunteers will have access to their own records at any time. If a volunteer wishes to access their personnel records they should ask the Administrator. References will only be disclosed if permission has been given by the referee.

### General Procedure

- Confidential information should only be passed between staff &/or volunteers on a 'need to know' basis.
- Staff & volunteers must be aware that descriptions of individual events & circumstances can lead to identification even when names have not been used, especially when the events or circumstances are unusual.
- Staff & volunteers at each site should make sure that no confidential information is in plain sight, in areas where clients could easily see it.
- Staff & volunteers should also ensure that no confidential information is left in plain sight (i.e. out on desks etc.)
- Confidential information on paper must be shredded once it is no longer needed. It must not be thrown away or recycled with normal paper.
- Individuals have the right to access information held on them within **Acts 4 Sharing**, with reasonable notice. A small charge may be made if a cost is involved e.g. photocopying, archive access, or significant amounts of staff time.

### Identity and Data Protection

Confidential information will not be passed out by any staff or volunteers at **Acts 4 Sharing**. If anyone requests information they will be asked for their contact details so that these can be passed onto the person concerned, thus enabling them to make contact in themselves. The only exceptions to this would be if a police officer or social worker visited 'the office' with appropriate ID to ask for confidential information that we may hold.

All staff & volunteers are required to work within this confidentiality policy & their written agreement to this will be obtained at the commencement of employment or volunteering.

***Agreed by Trustees: January 2018 Reviewed by Trustees November 2020 – next review date is November 2025 unless relevant legislation/regulations change***

*Other related policies for cross reference:*

*Equal Opportunities Policy*

*Safeguarding Policy*

*Data Protection Policy*