



Confidentiality Policy

The aim of this policy is to set out clearly for staff, volunteers, clients, board members and external agencies how personal information will be managed by The Bureau.

1. Introduction

Volunteer Centre Glossop's confidentiality policy/procedure is set out below. All staff, volunteers and Trustees are expected to abide by this policy. Clients using our service will have the relevant aspects of the confidentiality policy explained to them.

The principle of this procedure is to ensure that the safety of those in contact with The Bureau is maintained and that their rights are protected. The Bureau is committed to maintaining high standards of confidentiality in all aspects of its work. This includes records and information pertaining to employees, clients and prospective clients. Breaches of confidentiality may jeopardise the well being of staff and clients and consequently will be subject to disciplinary proceedings.

1.1 The purpose of this procedure is to give guidelines on maintaining confidentiality and the circumstances where disclosures may be necessary and the procedure for doing so.

2. Disclosure of information relating to member of staff

2.1 In all but defined cases (e.g. disciplinary procedures), the ultimate reference point for deciding who should be informed of a piece of confidential information is the individual to whom it applies. It is important, however, that where consent is given that it is informed consent. For this to be the case it is necessary to tell the person concerned why there is a need to disclose information and to whom. The person should also be told of the likely consequences of their agreeing or not agreeing to this. (In some instances, for example, non-disclosure could mean that the person's need for a service could not be identified.) Once consent has been obtained, it is the responsibility of the person passing on any information to ensure that this is only done on the terms agreed.

2.2 Disclosure of confidential information may require written authorisation by the individual concerned. This should be dated and specify to whom disclosure is authorised, for example if you are requesting information from one person's GP.

3. Disclosure of information relating to clients

3.1 Client files

3.1.1 All clients have the right to view their files. However, no clients will have access to any information from a third party (e.g. the client's partner, children or other agencies) which is stored in their files. This is to protect the safety and confidentiality of others. Therefore, third party information should be stored separately within the client record. All computer records will be password protected and compliant with The Bureau's IT security procedures.

4.1 Joint Working with Other Agencies

4.1.1 Where The Bureau is engaged in joint working with another agency it should be made explicit to the client what information will be shared and how their confidentiality will be protected. To ensure this the staff member should be fully aware of the confidentiality policy of the other agency and seek assurance that they are able to maintain confidentiality as outlined above.

4.2 Client Confidentiality

4.2.1 Information concerning clients in contact with The Bureau will be treated as confidential and no information which could lead to clients or their families being identified shall be disclosed to anyone outside The Bureau. The only exceptions to this policy are:

- If the client poses a threat to the safety of himself or others (including The Bureau's workers) the police or other appropriate services may be informed. The decision to inform must be taken by The Bureau's Community Companions Manager or Chief Officer
- If there is suspicion that the Client is being subject to abuse the issue must be referred to The Bureau's Community Companions Manager or Chief Officer to be dealt with under the policy for the protection of Vulnerable Adults.

4.3 Confidentiality between Clients

4.3.1 The Bureau cannot guarantee that other clients will maintain each others' confidentiality but we will take every reasonable step to ensure that they do so. When clients meet each other in group settings the issue of confidentiality will be discussed with them and clients will be asked to maintain each others' confidentiality.

4.4 Information about staff

4.4.1 A request for an employee's home address and telephone number will always be referred to the individual concerned before any information is disclosed. This is done via the line manager. There are some agencies that have some automatic right of access to certain parts of personnel information e.g. Inland Revenue or tax queries. The line manager will notify any staff member of any legal requirements whereby The Bureau is obliged to provide such information. Staff should never divulge a colleague's personal circumstances, including their address, future work place etc to anyone without permission of the worker.

4.5 Information within Volunteer Centre Glossop

4.5.1 This section gives guidance where staff are discussing clients amongst themselves/discussing a client with another agency on the telephone/when clients visit The Bureau's office:

4.5.2 Make sure any discussion happens in an appropriate place, e.g. not in an office where other staff or volunteers are working or where people are coming in and out of the place.

4.5.3 Do not gossip about clients with other clients, staff or Trustees.

4.5.4 Do not discuss personal facts about one client with another client or in the presence of another client.

4.5.5 Do not write derogatory comments about clients in their files (or anywhere else).

4.5.6 Do not leave information lying around or on screen but replace it in the appropriate place (locked filing cabinets).

5. Record Keeping

This procedure covers all records held by The Bureau concerning staff, volunteers, clients, trustees and potential clients.

5.1 Personnel Records

5.1.1 All staff will be given a copy of the confidentiality procedure as part of their induction. The implications of the procedure for their work will be explained.

5.1.2 Access to personnel files can be arranged with the line manager who should make clear the following:

- who has access to files and procedure for gaining access
- how the information is stored, e.g. locked cabinet

5.1.3 Application forms, interview records, medical information and monitoring forms are confidential to The Bureau.

5.1.4 Equal opportunity monitoring forms will be detached from application forms on receipt and kept separate from application forms.

5.1.5 References - when seeking references for a new employee it is made clear to the referees that information is sought in confidence.

5.1.6 Probationary reviews and appraisals. The line manager should make clear who receives information on the review.

5.1.7 Medical records will be held on personnel files in a sealed envelope. Copies of medical certificates and self certification forms will be placed on personnel files after action for payroll purposes.

5.1.8 Breaches of confidentiality by staff will normally be treated within the remit of The Bureau's disciplinary and grievance procedure. The nature of any breaches of this procedure will determine the level of disciplinary action, e.g. disclosure of unauthorised staff details would be gross misconduct.

5.2 Clients

5.2.1 A file concerning each client and volunteer will be kept by The Bureau's staff. The information recorded will be factual and where an opinion is recorded it will be clear that this is opinion and what this is based on.

5.2.2 This information should be kept in a filing cabinet, which is kept locked. All files must be returned to the cabinet after use.

5.2.3 If a client or volunteer asks to see their file, the relevant staff member should organise this and answer any questions about it and explain what has been written. The Bureau asks that clients give at least 24 hours notice when requesting access to their files.

5.2.4 All clients and volunteers are protected under the Data Protection Act 1988.

5.2.5 Clients and volunteers are expected to respect the rights of other clients and volunteers to confidentiality and privacy particularly as regards personal information known about another client.

5.2.6 Information will be kept for six years once a client or volunteer has left The Bureau. It will then be destroyed or archived.

5.2.7 Unsuccessful applicants – The Bureau may wish to monitor all applications and to keep information about applicants. Only the most relevant information should be kept, e.g. race, sex, sexuality, and the rest destroyed.

5.3 Trustees

5.3.1 New Trustees will be sent a copy of the confidentiality procedure and asked to take responsibility for implementing it.

5.3.2 All Board papers of a confidential nature will be marked 'Private and Confidential' and not included in the papers that are made public or widely available within The Bureau.

5.3.3 Clients will not normally be referred to by name, and discussion of their personal details at Board meetings will be only as necessary.

5.4 Partnerships with other organisations

5.5 The Bureau may be working in partnership with other bodies. Where specific information-sharing protocols exist that affect a particular client all agencies should be aware of this.

5.6 The Bureau will give all partnership agencies a copy of the confidentiality procedure and will explain the requirements it places on the partnership organisations.

5.7 It will be agreed at the outset which staff in the partner organisation will have access to information and in what circumstances.

5.8 Management agreements will state that breaches of confidentiality by either party will be treated as a breach of the agreement.

5.9 Training

5.10 Training on the confidentiality policy and its implications should be a standard part of induction procedures for staff, volunteers and trustees.

Review Date for this Policy: May 2017