



CONFIDENTIALITY POLICY

1. Introduction

This policy may be changed from time to time in line with current best practice and statutory requirements. You will be consulted and advised of any changes in advance to this policy, unless that change is required by statute.

Zennistoun Hub C.I.C. recognises that the handling of identifiable information is necessary to the effective management and performance of the organisation. This information is written, verbal and electronic. Information is held about individuals using and providing the organisation's services including volunteers, mentors/befrienders, service users, directors, voluntary organisations, and staff employed by the organisation.

2. Aims

The main aims of this policy are to:

- Ensure that **Zennistoun Hub C.I.C.** complies with the General Data Protection Regulations (GDPR, 2018) and the associated Codes of Practice.
- Ensure that information given in trust by users of the organisation services and staff members or held within the organisation for any other reason is treated with respect.
- Ensure that information is protected through clarity about how it is to be stored and shared.
- Ensure that the boundaries of confidentiality are clear and understood by staff.

The Policy is designed to:

- Ensure the organisation complies with the General Data Protection Regulations (GDPR, 2018) and associated Codes of Practice.
- Protect the best interests of staff, volunteers, directors, and service users
- Make explicit the responsibilities of staff concerning confidentiality
- Ensure users are aware of the organisation's responsibilities to protect confidential information.



3. Principles

This policy covers confidential information relating to staff, volunteers, and service users of the organisation. It is based on the principle that all such information should be treated as confidential. Information of this nature should only be shared when there is a clear, legitimate reason for doing so and with the permission of the staff member or service user concerned.

Although personal/sensitive information is protected by the organisation there are exceptional circumstances when confidential information would have to be disclosed. (These circumstances are noted in section 11 of the policy.)

4. Storage and Disposal of Information

It is the responsibility of the all staff and volunteers to ensure that personal/sensitive information about service users (individual clients, members, groups, and organisations) is treated as confidential and stored in a secure place.

Such information will be stored only if it is current and necessary to undertake tasks relating to service delivery.

The time limit for storage of general non-active information will be 5 years, where this is a legal requirement to do so. Information where there is no such legal requirement will be stored for an appropriate period of time, which may, on occasion, be specified. There may be instances in which information of a personal nature is held longer than 5 years at the discretion of the Committee.

The appropriate members of staff or Office Bearers will be responsible for shredding confidential papers when finished with and deleting them from computer files.

5. Access to Information

The organisation is on the Data Protection Register and adheres to principles and practices outlined in the General Data Protection Regulations (GDPR, 2018).

The organisation operates an Open Access Policy in relation to files and computer records, whereby service users and staff members have access to information held about them. To access information, service users would be obliged to give the Chair of the Board five working days' notice and a reason as to why they want to access the information.

Information regarding service users is confidential to the team from whom they receive a service, and not to the individual staff member/volunteer working with them. This



enables other team members/volunteers to have access to information when staff/volunteers are absent.

Information considered sensitive regarding an individual service user and affecting the work we are engaged in with the user should be reported to the employee's line manager, who is responsible for monitoring the situation outlined.

Only information regarding service users which is directly relevant to service provision will be held on record. Information given for one purpose will not be used for another purpose.

In the case of working with a group, individual group members have the right to access general group files stored at the organisation but not to personal information about other group members. Likewise, personal information e.g. phone numbers, addresses, relating to staff members will not be given to other staff members, volunteers, or service users without the permission of that person.

6. Boundaries of Confidentiality in Supervision Within the Organisation

In supervision, confidential information can be discussed relating to professional and, at times, personal issues when they are affecting the individual staff member's work. The supervisor (Appointed member of Committee) is responsible for treating this information as confidential.

The supervisor has the responsibility to ensure that recordings of supervision sessions are kept in a secure place.

All information discussed in supervision will be considered confidential by both the Supervisor and the volunteer being supervised.

Some issues arising in supervision may need to be discussed with the Project Coordinator in order to reach a resolution. In this situation, both the supervisor and volunteer being supervised should agree to this course of action.

7. Personnel Files

Personnel files are confidential, with access to a staff member or volunteers file being limited to the Board and to the individual at any time during office hours. Personnel files are kept up to date by the appointed Committee member who, can access these files for this purpose only. Access to the appointed Committee member's personnel files is limited to the Chair of the Board and the Secretary.



Personnel files are confidential and will be kept in a locked filing cabinet and both the Chair and Secretary will hold the keys.

8. Personal Issues Affecting Staff Members

Staff members and volunteers have the option of discussing personal issues adversely affecting their work in confidence with a member of the Board. The Board member should then take appropriate measures to address these issues without breaking confidentiality, subject to the staff member's or volunteer's agreement. This may include discussion with an appropriate other person and placing a record of this into the staff member's or volunteer's personnel file.

When sickness leave is taken a medical certificate must be sent to the Board. Information on the nature of the illness will not be made known to other staff members or volunteers. To ensure this, sickness lines should be submitted in sealed envelopes and marked confidential.

9. Telephone Calls and Letters

Any mail sent to a staff member or volunteer and marked Private and/or Confidential will not be opened by another staff member or volunteer.

Access to a room where phone calls can be made in private will be available to staff or volunteers working in open plan offices.

10. Breach of Confidentiality

All staff and volunteers are required to maintain confidentiality in accordance with this policy. Inappropriate disclosures will be treated as a disciplinary matter and dealt with in accordance with disciplinary procedures. Action taken may include dismissal.

Confidentiality is often a misunderstood notion and it is important that the **Zennistoun Hub C.I.C.** provides a service that is responsible and trustworthy which ensures that:

- All information regarding service users and their family or living circumstances must remain confidential to the service team
- Staff and volunteers should only discuss relevant information relating to service users in the context of support, supervision, or training
- Staff or volunteers must not divulge or disclose the identity of a service user or their family to anyone outside the organisation
- Staff and volunteers must not divulge personal details to outside agencies or individuals without the service user's knowledge or consent



11. Exceptional Disclosure of Information

Exceptional circumstances may occur where the protection of a service user, a staff member/volunteer or a third party or another person must be ensured and to do so would involve disclosure of information, whether or not agreement has been reached with the service user. In this situation, the staff member/volunteer involved should seek advice immediately from the Chair or another Board member.

The Chair will comply with Health and Safety legislation by informing the workplace of any notification received about any contagious or notifiable disease suffered by any person with whom workers/volunteers may have had contact during the course of their duties.

In the event of a serious issue arising of a line management nature (for example, gross misconduct such as threatening behaviour, fraud or theft) another volunteer or staff member may raise this with the Chair with or without the staff member's or volunteer's agreement.

There is a legal requirement to disclose information in the event of a vulnerable adult/child protection issue or Police enquiry, **Zennistoun Hub C.I.C** recognises that the protection of adults and children at risk of harm or abuse is placed above all other operating principles and supersedes the principle of confidentiality.

12. Information and Training

All employees and volunteers will be provided with this policy document.

The Zennistoun Hub C.I.C. will provide training on issues relating to confidentiality and the contents of this policy to ensure that work practices are in line with the requirements of this policy.

Staff/Volunteers working on a regular basis with service users will inform them of this policy document and ensure a copy is provided to them.

13. Monitoring

The working of this policy will be monitored regularly, with a record of the number and nature of formal complaints being held by the Chair for monitoring purposes.



Implementation Date:

Review Date:

Signed: (for and on behalf Zennistoun Hub C.I.C.)