



# Confidentiality Policy

Policy No: 002      Type: Operational      Version No: 2.0

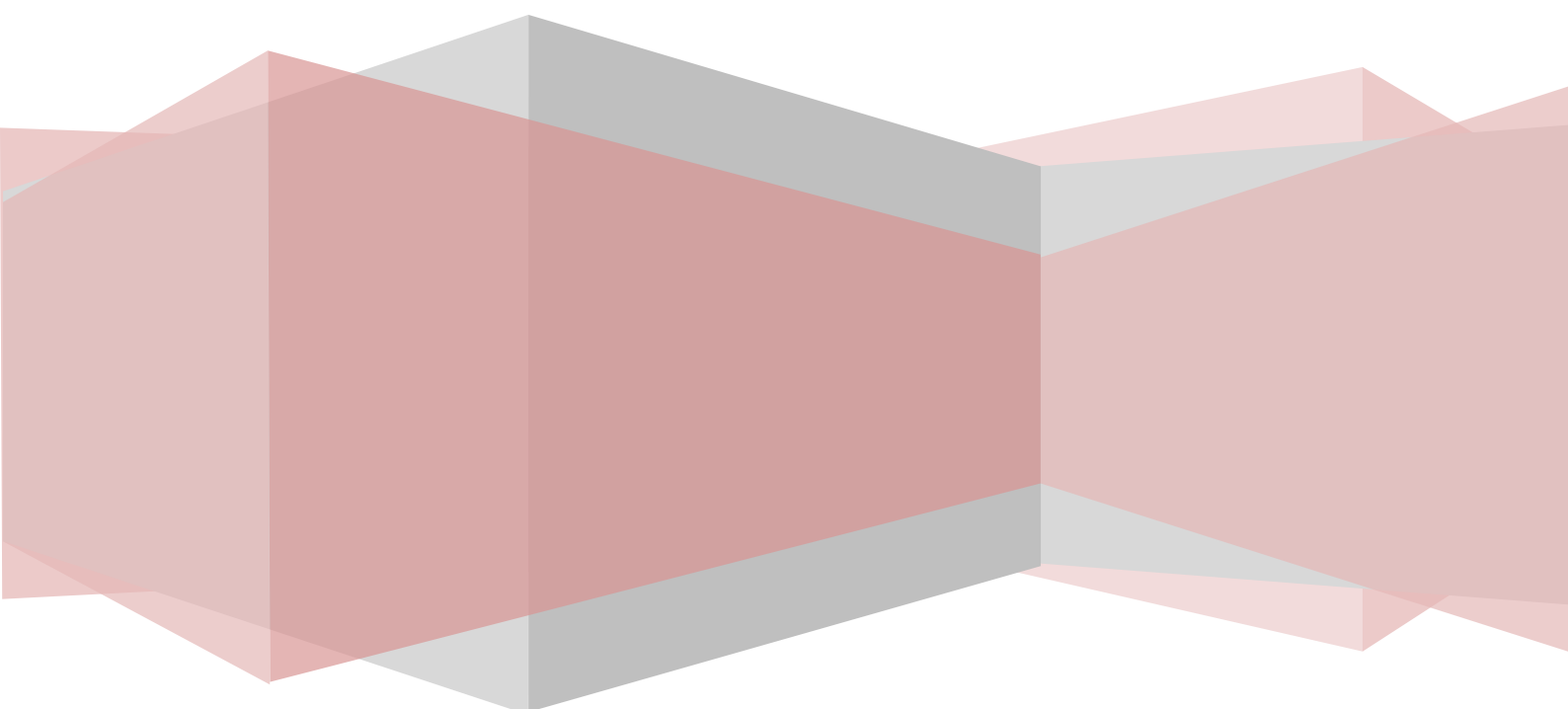
Author: Alan Webb      Date: May 2005

Approved by Trustee: ..... Date: .....  
( J.R. Holmes)

Recorded by Office: ..... Date: .....  
(A.D. Webb)

Issue Date: May 2011

Reviewer: ..... Date: .....



## Review Record

Reviewer	Trustee Approved	Changes Made	Version No.	Date
Alan Webb		Rewrite to match style of Charity and update to make clearer	2.0	May 2011

### 1. Terminology and cross reference

- 1.1. The term “charity” refers to the Connection Bus Project.
- 1.2. The term “staff” refers to employees, volunteers and trustees of the charity
- 1.3. The term “senior staff” refers to the full-time employees of the charity
- 1.4. The term “designated safeguarding officer” refers to staff that have had the appropriate training and hold the responsibility of decision making on issues of safeguarding within the charity.
- 1.5. The term “lead worker” refers to the member of staff responsible for leading the work of the charity within a session.
- 1.6. The term “workers” refers to those employed as youth workers by the charity.
- 1.7. The term “volunteers” refers to those that are formally contracted by the charity to assist workers.
- 1.8. The term “user” refers to young people accessing the charity’s facilities and activities.
- 1.9. This policy should be read in conjunction with Data Protection Policy 003 and Safeguarding Policy 001.

### 2. General principle

- 2.1. The charity recognises that during the course of their work or activities staff will gain information about organisations and individuals, other staff, and young people and their families. In most cases such information will not be stated as confidential and staff 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, workers and volunteers should seek advice from the senior staff. The senior staff should seek advice from their line manager or a trustee. Trustees should consult other trustees and/or the project manager as appropriate.
- 2.2. Confidential information is defined by the Oxford English Dictionary as “any information that is intended to be kept secret”. This definition underpins the charity’s policy.

### 3. Policy

- 3.1. Information obtained by the charity in the course of its work is the property of the organisation. Information will be shared amongst the workers, lead workers and senior staff in the best interest of the young people in providing a complete service and monitoring of concerns, issues and progress. However, any information that is confidential should only be shared on a need to know basis with the lead worker and/or senior staff as is appropriate.

## **4. Procedure**

- 4.1. When sharing information it must be made clear by staff how reliable they feel it is, assessing its source and the circumstance of the conversation or other communication that the information came from.
- 4.2. Staff should avoid bringing into any discussion with any young person confidential information that has come from any source other than directly from the young person in question. For example a member of staff may be aware through debriefing that a young person has had a conversation with another staff member about their parents divorcing. This information should not be used by the member of staff until the young person confides directly with them, or there is reason to believe that the information is no longer confidential as other young people are talking about it.
- 4.3. It is not appropriate to discuss an individual's sexuality (e.g. 'outing' a gay person). If there is reason to do so it should only be with that individuals' prior consent.
- 4.4. Staff will not disclose to anyone, other than the lead worker or senior staff, any information considered confidential including, personal, financial, medical or private without the knowledge or consent of the user, or an officer or member of staff in the case of another organisation.
- 4.5. There may be circumstances where staff would want to discuss difficult situations with each other to gain a wider perspective on how to approach a problem. Should a user be involved their consent must be sought before discussing the situation, unless the staff member is convinced beyond doubt that the user would not object to this. Alternatively, a discussion may take place without names or identifying information being used.
- 4.6. Where information is sensitive, i.e. it involves disputes or legal issues; it will be confidential to the employee dealing with the case and the project manager or a member of staff assigned by the project manager to oversee the case. Such information should be clearly labelled 'Confidential' and should state the names of the staff entitled to access the information and the name of the individual or organisation who may request access to the information.
- 4.7. Staff will not withhold information from the senior staff unless it is purely personal.
- 4.8. When photocopying or working on confidential documents, staff must ensure they are not seen by other people. This also applies to information on computer screens.

## **5. Duty to disclose information**

- 5.1. There is a legal duty to disclose some information including:
  - 5.1.1. Child abuse: which will be reported to the Social Services Department
  - 5.1.2. Drug use, dealing or trafficking; money laundering; acts of terrorism or treason. These will all be disclosed to the police.

- 5.2. In addition staff believing an illegal act has taken place or that a user is at risk of harming themselves or others, must report this to lead worker and/or senior staff who will report it to the appropriate authorities.
- 5.3. Users and staff should be informed of disclosures relating to 5.1 and 5.2, before disclosure is made, where this is possible.

## **6. Sharing of Information**

- 6.1. Where there is collaboration with staff of another agency officially working during a session,
  - 6.1.1. The Project Manager will ensure that the partner organisation has a satisfactory Confidentiality Policy
  - 6.1.2. The member of staff from the other agency will be present for an initial debriefing and information entered into the database will be shared with them and the organisation they represent. Any information that a member of staff doesn't feel should be shared in this way should be passed on to the lead worker or senior staff separately.
  - 6.1.3. External staff, invited to present themed sessions to young people, will only be given statistical information or data that cannot be related to individual young people.

## **7. Breach of confidentiality**

- 7.1. Employees who are dissatisfied with the conduct or actions of other staff or the charity should raise this with the project manager or chair of the trustees using the Disciplinary Procedures (008), if necessary, and not discuss their dissatisfaction outside the charity.
- 7.2. Staff gaining unauthorised access to files or other information, or breaching confidentiality may face disciplinary action. Ex-employees or ex-volunteers breaching confidentiality may face legal action.