

Waddington Street Centre Limited

Confidentiality Policy



This policy applies to all staff and volunteers of Waddington Street Centre. The data covered by the confidentiality policy, whether recorded electronically or in paper form, includes:

- Information about the organisation, for example, its plans or finances
- Information about other organisations
- Information about individuals, for example, service users (known as Waddy Members), volunteers and staff

All staff, volunteers and others who work at the Waddington Street Centre must respect the need for confidentiality of information held about anyone who comes into contact with the charity, and about any charity business. This is expected to continue even when contact has ceased with this person, and when the volunteer or staff member no longer works for the Waddington Street Centre.

This policy should be read in conjunction with the Waddington Street Centre Data Protection including GDPR (General Data Protection Regulation*) Policy.

*(*The GDPR's primary aim is to give control to individuals over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU. Introduced 25th May 2018)*

Information about individuals

Waddington Street Centre is committed to ensuring confidential services to all individuals. The confidentiality is between the individual and the organisation, not the members of staff delivering a particular service.

Confidential information will not be sought from a service user unless expressly in the interests of that service user, i.e. to enable a better service delivery.

Information will only be passed to another agency or to other individuals outside of the charity with the consent of the service user; where possible this will be with written consent. If a member of staff or volunteer intends to get information from another agency to help the service user or to refer them to another agency then this must be explained to the service user and their permission obtained.

No personal information about staff, volunteers or service users will be given to any third party including a member of their family, without consent. Information will only be divulged on a "need to know" basis.

Information will be treated in confidence and will not be divulged to anyone outside the organisation except where extenuating circumstances exist (see below). However, in order that we can provide the best possible help to our service users it may be necessary to share information with the manager or colleagues within the Waddington Street Centre.

All service users are entitled to privacy and will be made aware that they can specifically request to be seen in private.

In no circumstances should details of a service user be discussed by anyone outside of the organisation or in an open plan area in such a manner that it is possible to be overheard and to identify the service user.

Staff and volunteers should take due care and attention when speaking to service users and using the telephone or fax. No service user should be able to hear a conversation or personal details of another service user.

Service user records

- All records relating to service users at Waddington Street Centre will be kept in a locked filing cabinet in the assistant manager's office or the housing office; the offices will be locked at all times when no one is present. Staff and volunteers apart, the only people with access to files will be those for whom the files are directly relevant.
- No service user records will be taken off the premises. When service user files are needed staff will obtain them from the cabinets and return them whenever they are not using them.
- Referral forms for those people who did not take up services at Waddington Street Centre will be destroyed after six months. The forms of those who did receive services will be kept for three years and thereafter will be destroyed.
- Service user records held by Waddington Street Centre fall under the procedures detailed within the Centre's Data Protection including GDPR Policy.

Use of client information for publicity, reporting or training purposes

Waddington Street Centre does need to be able to give information where appropriate about the impact of our services.

If one of our services has an outcome which would provide useful material for publicity, reporting or training purposes, then wherever possible the permission of the service user will be sought in writing before the story is told to anyone else. If permission cannot be obtained then any details that would enable identification of the service user to be made will be changed.

Limits to service user confidentiality

In certain circumstances Waddington Street Centre reserves the right to break confidentiality should this be deemed necessary. These circumstances include:

- If a member of staff believes that a service user could cause danger to themselves or to others.
- If a member of staff suspects abuse or has knowledge of abuse
- If the service user gives information which indicates that a crime has been committed
- If disclosure is required by law, for example, by the police
- If a person is felt to lack the mental capacity to make a decision. In such cases staff or volunteers will discuss with the manager and they will only act in the service user's best interest. The manager or in their absence the assistant manager will make the decision
- If the service user gives information which indicates a possible terrorist threat.

The decision on whether to break confidentiality will be decided on a case by case basis and always in conjunction with the manager or in their absence the assistant manager.

Access to data

This Policy operates on a “need to know” basis and apart from staff and volunteers in the Waddington Street Centre, no-one will have access to service user or organisational information unless it is relevant to the service or their work. Again, if permission cannot be obtained then any details that would enable identification of the service user to be made will be changed.

All service users have the right to request access to all information stored about them, and have a right to see a copy of this confidentiality policy on request.

If any party concerned has a sensory or physical impairment, efforts should be made to ensure that all aspects of this policy and exchanges between parties are understood.

Significant breaches of this policy will be handled under the Waddington Street Centre disciplinary procedures.

Evaluation and Monitoring

All staff and volunteers will be given a copy of the policy when they join Waddington Street Centre and will sign the confidentiality statement that they will abide by this policy. Waddington Street Centre will ensure that all staff and volunteers are trained in the application of this policy.

The policy will be reviewed on a three yearly basis and approved by the board of trustees. It will also be reviewed in response to changes in relevant legislation, contractual arrangements, good practice or in response to an identified failing in its effectiveness.

Date this policy was approved by the Board of trustees: 28th September 2020



Confidentiality statement for staff and volunteers
(as part of the Confidentiality Policy – pages 1 to 3)

When working for the Waddington Street Centre, you will often need to have access to confidential information which may include, for example:

- Personal information about individuals who are service users or otherwise involved in the activities organised by the Waddington Street Centre.
- Information about the internal business of the Waddington Street Centre.
- Personal information about staff or volunteers working for the Waddington Street Centre.

The Waddington Street Centre is committed to keeping this information confidential, in order to protect people and the Waddington Street Centre itself. ‘Confidential’ means that all access to information must be on a “need to know” basis and properly authorised basis. You must use only the information you have been authorised to use, and for purposes that have been authorised. You should also be aware that under the Data Protection Act 2018, unauthorised access to data about individuals is a criminal offence.

You must assume that information is confidential unless you know that it is intended by the Waddington Street Centre to be made public.

You must also be particularly careful not to disclose confidential information to unauthorised people or cause a breach of security. In particular you must:

- not compromise or seek to evade security measures (including computer passwords);
- be particularly careful when sending information to other agencies and organisations;
- not gossip about confidential information, either with colleagues or people outside the Waddington Street Centre;
- not disclose information — especially over the telephone — unless you are sure that you know who you are disclosing it to, and that they are authorised to have it.

If you are in doubt about whether to disclose information or not, do not guess. Withhold the information while you check with an appropriate person whether the disclosure is appropriate.

Your confidentiality obligations continue to apply indefinitely after you have stopped working or volunteering for the Waddington Street Centre.

**I have read and understand the above statement and the Confidentiality Policy.
I accept my responsibilities regarding confidentiality.**

Signed:

Date: