

CONFIDENTIALITY POLICY

Objective

The objective of the Policy is to set guidelines which reduce the risk of a security breach, fraud and information theft.

Background

The main reasons for the policy are to:

- reduce the threat of a security breach and information theft
- ensure compliance with Data Protection regulations including General Data Protection Regulations (GDPR) – keeping personal data secure
- reduce the chance of identity theft
- show that Women's Health Hope is taking responsibility for the personal data in its care.

In this document 'colleagues' are employees, volunteers, trustees, and learners of Women's Health Hope.

1. General Principles

1.1. Women's Health Hope recognises that 'colleagues' gain information about individuals and organisations during the course of their work or activities. In most cases, such information will not be stated as confidential and colleagues may have to exercise common sense and discretion in identifying whether the individuals or groups expect Women's Health Hope to keep the information confidential. This policy aims to give guidance; but if in doubt, seek advice from the CEO Monica Thomas.

1.2. Information received by Women's Health Hope, as part of the services it provides, will be considered to be information for Women's Health Hope to share with 'colleagues' and use to deliver its aims and objectives.

1.3. 'Colleagues' are able to share information with the CEO, Monica Thomas in order to discuss issues and seek advice.

1.4. 'Colleagues' should inform groups, organisations or individuals why they are requesting information and explain the purpose of storing and using this information. 'Colleagues' should ask permission to keep and use this information, particularly relating to the database of members.. 'Colleagues' should avoid exchanging personal information or comments (gossip) about individuals with whom they have a professional relationship.

CONFIDENTIALITY POLICY

- 1.6. It is not appropriate to discuss a person's sexuality without their prior consent. Please refer to the Equality and Diversity Policy for further guidance
- 1.7. 'Colleagues' should avoid talking about organisations or individuals in social settings, or in any environment where they may be overheard, for example reception and corridors.
- 1.8. 'Colleagues' will not disclose to anyone, other than to the CEO, Monica Thomas, any information considered sensitive, personal, financial or private without the knowledge or consent of the individual, or an officer in the case of an organisation.
- 1.9. There may be circumstances where 'colleagues' want to discuss difficult situations with each other to gain a wider perspective on how to approach a problem.
- 1.10. If 'colleagues' receive information from individuals outside Women's Health Hope regarding the conduct of a colleague or group, then this should be dealt with sensitively. The appropriate colleague should tell the individual about the Complaint Procedure and advise them accordingly.
- 1.11. If employees are dissatisfied with the conduct of a colleague, and have sensitive information that could be evidenced through investigation, they should discuss it with CEO, Monica Thomas, or any trustee under the Whistle Blowing Procedure. Any allegation, which is found to be malicious, or ill-founded, will be dealt with by Women's Health Hope under the Disciplinary Procedure.
- 1.12. Where Women's Health Hope has a legal duty to disclose information, Women's Health Hope will tell the person involved that the disclosure has or will be made.

2. Why Information is Held

- 2.1. Most information held by Women's Health Hope relates to voluntary and community organisations, self help groups, volunteers, learners, employees, trustees or services that support or fund them.
- 2.2. Women's Health Hope keeps information to enable Women's Health Hope colleagues to understand the history and activities of organisations in order to deliver the most appropriate services.
- 2.3. Women's Health Hope has a role in putting people in touch with voluntary organisations. Women's Health Hope keeps contact details that are passed on to appropriate enquirers, except where the group or organisation expressly requests that the details remain confidential.
- 2.4. Women's Health Hope gives information about volunteers to known groups or statutory agencies which request volunteers, but does not disclose these details to anyone else.

CONFIDENTIALITY POLICY

2.5. Women's Health Hope will give references for current and past employees, students, volunteers and people participating in support programmes for unemployed people to organisations, providing the individual concerned has given their consent. Women's Health Hope will give information about learners to the training organisation and college involved.

2.6. Women's Health Hope keeps monitoring information to monitor its Equal Opportunities Policy and also for reporting back to funders.

3. Access to Information

3.1. Women's Health Hope will share some information within the organisation and may pass it to colleagues to ensure Organisation Name can provide service users with the best quality service.

3.2. If a colleague has some sensitive information, for example information about disputes or legal issues, they will only share it with the CEO, Monica Thomas. Colleagues should clearly label such information as 'Confidential' and should state the names of the colleagues entitled to access the information and the name of the individual or group who may request access to the information.

3.3. Colleagues should not withhold information from the CEO, Monica Thomas unless it is purely personal to them and not business related. If an individual gives information to a colleague and clearly stipulates it is confidential, then this will not be shared with CEO, Monica Thomas, unless there is a concern and the individual informed. Please see point 5.2.

3.4. Users may see Women's Health Hope records which relate to them or their organisation. They must request this by writing to the Chief Executive Officer giving 14 days' notice. The letter must be signed by the individual, or in the case of an organisation's records, by the Chair or Executive Officer. Women's Health Hope will only make sensitive information, as outlined in point 3.2, available to the person or organisation named on the file.

Personnel records can be accessed by giving 14 days' notice in writing to the Resource Co-ordinator (for staff) and the Volunteer Co-ordinator (for volunteers).

3.6. When colleagues are photocopying or working on confidential documents, they must ensure that people passing by do not see the documents. This also applies to information on computer screens. Colleagues should check that they do not leave original documents on the photocopier and use 'secure printing' when printing confidential documents on printers that are not close by.

CONFIDENTIALITY POLICY

4 Storing Information

- 4.1. General, non-confidential, information about organisations is kept in unlocked filing cabinets that are available to all Women's Health Hope colleagues.**
- 4.2. Colleagues taking records to meetings outside of Women's Health Hope offices are responsible for ensuring they remain confidential and for keeping them.**
- 4.3. Colleagues who are directly responsible for information about volunteers, students and other individuals must ensure that it is kept in a filing cabinet. They should mark files or filing cabinet drawers that contain confidential information as 'Confidential' and keep them locked. They should make the CEO, Monica Thomas aware of this and tell them where they keep the keys.**
- 4.4. The Resource Co-ordinator will keep employees' personnel information and the Volunteer Development Co-ordinator will keep volunteer records in lockable filing cabinets.**
- 4.5. The Resource Co-ordinator will keep recruitment information, for example completed application forms, advert and job description, for a period of two years from the date of the advert. After this date, Women's Health Hope will keep monitoring information on equal opportunities statistics for a further two years.**
- 4.6. Colleagues should protect confidential information held on computer either in a 'secure folder' or a pass worded document. They should give details of the password to the Resource Co-ordinator, who will keep them secure.**
- 4.7. In an emergency situation, the Chief Executive Officer may authorise access to files by other people.**
- 4.8. Ensure confidential documentation or personal data is shredded before putting in the recycling bins.**

5. Duty to Disclose Information

- 5.1. Women's Health Hope has a legal duty to disclose some information including:**
 - 5.1.1. Child abuse will be reported to the Social Services Department.**
 - 5.1.2. Drug trafficking, money laundering and acts of terrorism or treason will be disclosed to the police.**
- 5.2. In addition, colleagues believing an illegal act has taken place, or that a user is at risk of harming themselves or others, must report this to the Chief Executive Officer who will report it to the appropriate authorities.**
- 5.3. Women's Health Hope should inform the users involved of this disclosure.**

CONFIDENTIALITY POLICY

6. Disclosures

- 6.1. Women's Health Hope complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information.**
- 6.2. Women's Health Hope will request pre-employment DBS checks for new employees and volunteers whose posts involve contact with children or vulnerable adults, as specified by the Disclosure Guidance.**
- 6.3. Women's Health Hope will clearly state the need for, and level of, disclosure on the recruitment advert.**
- 6.4. The Chief Executive Officer and Resource Co-ordinator will follow the procedure for obtaining Disclosure for the successful applicant.**
- 6.5. The Resource Co-ordinator will keep a record of: date of issue of a disclosure, name of the subject, type of disclosure requested, position for which the disclosure was requested, unique reference number of the disclosure and the details of the recruitment decision taken.**
- 6.6. Only the employee's line manager and the Chief Executive Officer/Resource Co-ordinator will discuss information provided through the disclosure. They will use the Women's Health Hope Recruitment Policy as guidance.**
- 6.7. The Resource Co-ordinator will keep disclosure information separately from an applicant's personnel file in secure storage. Women's Health Hope will limit access to those who are entitled to see it as part of their duties. It is a criminal offence to pass this information to anyone who is not entitled to receive it.**

7. Data Protection Act

7.1. Any information that Women's Health Hope holds about individuals, whether on the computer system or on paper, falls within the scope of the Data Protection Act. Women's Health Hope must comply with the data protection principles. These principles state that personal data must be:

- obtained and processed fairly, lawfully and transparently;**
- held only for specified purposes;**
- adequate, relevant and not excessive;**
- accurate and up to date;**
- not kept longer than necessary;**
- processed in accordance with the Act;**

CONFIDENTIALITY POLICY

- kept secure and protected; and
- not transferred out of Europe.

7.2. Women's Health Hope will review all the information it holds on a two-yearly basis to ensure the information requested complies with the statements in point 5.1. This will be coordinated by the Information Officer and, in respect of personnel information, Resource Co-ordinator.

8. Breach of Confidentiality

8.1. Colleagues who are dissatisfied with the conduct or actions of other colleagues or Women's Health Hope should raise this with their line manager using the grievance

procedure if necessary. They should not discuss their dissatisfaction outside Women's Health Hope.

8.2. Colleagues accessing unauthorised files or breaching confidentiality may face disciplinary action. Ex-employees breaching confidentiality may face legal action.

8.3. If a colleague opens a computer or paper file which they then realise is confidential, they must tell the person who 'owns' the file. They must not discuss the contents of the file with anybody else. However, colleagues must do everything reasonable to protect their files.

9. Whistle Blowing

9.1. Any colleagues who have concerns about the use of Women's Health Hope funds, or any practice by any employee, must comply with the requirements of the Whistle Blowing Procedure.