**Confidentiality Policy**

**Definitions**

Where the words ‘woman’ or ‘women’ are used in this document they should be understood to refer to service users of StreetlightUK. ‘Worker’ refers to any StreetlightUK volunteers and employees. ‘Applicants’ refers to people who apply for voluntary work with StreetlightUK but who do not subsequently join the project.

**Key Statement**

StreetlightUK workers will respect the rights of the women, volunteers and employees to a relationship of trust, privacy, reliability and confidentiality, and to the responsible use of information obtained from them or about them.

1. **The women**

1.1 **Sharing information**

1.1.1 Any information passed to any worker may be shared with others workers on a ‘need to know’ basis

1.1.2 Discussion about any woman with other workers should be purposeful and not trivializing.

1.1.3 Discussion about the women with people outside of StreetlightUK should be purposeful and not identify any individual unless excepted by 3 below.

1.1.4. Information given to any worker about one of the women may be given to the woman’s family or friends, or to any other agency **but only with the woman’s informed consent**, unless exceptional circumstances prevail (see 1.4 below). This includes any information about whether or not someone uses the service

1.1.5 Reasonable care should be taken to ensure that discussions, conversations, and telephone calls relating to confidential matters cannot be overheard.

1.1.6 Reasonable care should be taken when meeting one of the women on a befriending basis to ensure that confidentiality is maintained.

1.2 **Recording in general.**

1.2.1 Any records which are kept, relating to and identifying the women, must be stored securely, to prevent intentional or accidental viewing. Written records are kept in a lockable cabinet. Computer records are only accessible with a password.

1.2.2 Where a woman is receiving casework services she will be asked to complete a consent to store and release information form.

1.2.3 Only members of employees and resettlement volunteers have access to women’s records. These will only be kept for as long as necessary.

1.3 **Recording in particular**

1.3.1 Casework related notes and documents will only be kept for two years after the last casework related contact. After this date a note of her name and last known contact details will be kept in case of a future positive need for contacting her.

1.3.2 Outreach records do not identify individuals sufficiently to be of concern.

1.3.3 Completed child protection and vulnerable adult protection forms are kept in a locked cabinet and need to be kept indefinitely in case of criminal proceedings that are not time barred.

1.3.4 Ugly mugs need to be kept indefinitely because of their potential for use in criminal proceedings and are also kept in a locked cabinet.

1.4 Confidentiality

1.4.1 **Confidentiality may be breached only in the following circumstances and after consultation with the Project Director, or if the former are unobtainable, with a team leader or experienced worker, (unless someone is in imminent danger when confidentiality must be breached without prior consultation):**

1.4.1.1 Where there is a risk of physical harm to anyone.

1.4.1.2 Where a child is judged to be at risk of sexual abuse, neglect or physical abuse (see Child Protection Policy).

1.4.1.3 Where it is in the woman's interest to do so and it is believed by StreetlightUK that her consent would be given to share information but where it has not been possible to contact her for informed consent or to get her prior consent because of her restricted cognitive capacity. In cases where it is established that a woman is receiving casework services from StreetlightUK she will have had opportunity to discuss her preferences in respect of the use of information relating to her in going through the consent to store and release information form with her caseworker.

1.4.1.4 Where there is a legal obligation on StreetlightUK to disclose information; in these circumstances StreetlightUK will take all possible steps to ensure that information regarding other women or workers is not disclosed without their consent.

1.4.1.5 Where it is absolutely necessary in order to maintain the reputation of StreetlightUK and the benefit of the women as a whole.

1.4.2 **In cases covered by 1.4.1, 1.4.2, 1.4.4 and 1.4.5 the woman will be informed of the need to breach confidentiality prior to this happening or, in all instances, as soon as possible afterwards if prior notification is not possible.**

1.4.3 Relationships with other agencies will be co-operative as this policy allows.

2. **Workers**

2.1 Sharing information

2.1.1 Workers' home addresses and telephone numbers and other non-work related information will not be disclosed to the women or other enquirers.

2.1.2 Information about volunteers and employees is only shared within the organisation on a need-to-know basis.

2.1.3 Confidentiality will only be breached in circumstances recited at 1.4.1, 1.4.2, and 1.4.4 and 1.4.5 above or if consent is given.

2.1.4 Volunteer and employees files are kept in a locked cabinet (see Data Protection Policy).

2.2. **Breaches of confidentiality**

2.2.1 If a volunteer worker has breached confidentiality he/she will be asked to a meeting with the team leader and if he/she cannot satisfactorily explain that the breach was covered by any of the exceptions at 1.4 above, disciplinary action will be taken whereby, after consultation with the project Director, he/she will be asked to be on probation or asked to withdraw from StreetlightUK immediately. If he/she disagrees with the decision of the Project Director he/she should address a letter outlining the grievance to the Trustees who must respond within a week offering him/her a meeting with two of their number, the Project Director and the volunteer. Their decision following this meeting must be communicated to the volunteer in the following week

2.2.2 If an employee has breached confidentiality the employee's disciplinary procedures will be followed as stated in the employee's Terms of Employment.

**3. Applicants**

3.1 Applications

3.1.1 All potential workers will complete a StreetlightUK application form. Applicants are also asked to separately disclose information about criminal investigations and convictions. All information from applicants will be shredded after 3 months if they are not accepted as workers.

3.1.2 A full, enhanced CRB disclosure is required for all applicants. We follow CRB guidelines on the retention or destruction of CRB Disclosures.

3.1.3 All information relating to applicants, including our application forms, completed Disclosure Applications and CRB disclosures, are kept in a locked cabinet.