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**Confidentiality Policy Notes**

**Purpose**

* To provide uniformity in practice for employees and volunteers in terms of handling client data and project information securely and identifying in what instances confidential information may be disclosed.

**Practical application**

* Protection of privacy is an important principle in ensuring everyone feels safe and respected and in building trust in relationships.
* Your service users in particular need to know that providing/disclosing personal information to your project will remain confidential and will not be shared with others without their consent, in which case they will need to know who is using the information and why.
* Consider what information your project will need to keep about employees, volunteers and service users
* How will you ensure you have secure record keeping systems e.g. locked cabinets, password protected computer files?
* Identify in what instances confidential information may be divulged without an individual’s consent e.g.
	+ - If a child is believed to be at risk
		- If the safety of another person is at stake
		- If information on criminal activity has been given for legal proceedings
		- If there is a sufficient threat to the project’s integrity or good reputation e.g. concerns or malpractice or wrong doing involving harmful or illegal activity in which case ‘whistle blowing’ may be the appropriate course of action.
		- Where information is used for e.g. reports, development or funding, these should be presented as statistics or aggregate data, thus ensuring that confidentiality is maintained and that individuals cannot be identified.
		- Consider what process will be appropriate if there is a perceived or actual breach of confidentiality
		- Familiarise yourself with the Data Protection Act 1998.

**Complying with the Data Protection Act 1998 with regard to recording and sharing information.**

The specific systems covered by the Act are those containing information about a data subject (i.e. living individual). This now includes manual data such as filing systems and case records. Whenever you work with these sorts of information you must ensure that you are working within the standards laid out by the Act. Although it is the organisation that is registered as the data controller, you could become personally liable in the event of misuse or non-registration of personal data or data relating to a data subject.

If you hold personal data, you are responsible for its safe-keeping and must ensure that it is processed fairly and lawfully. Data must be accurate and kept up to date. Personal data (which includes both computer and manual records) must not be kept longer than necessary for the purpose for which it is being processed.

Data subjects can apply to see and or complain about information held about them. You should inform service users of their right to see information held about them.

Information on the Act is available from the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, England. Tel 08456 30 60 60. Email notification@ico.gsi.gov.uk Website [www.ico.gov.uk](http://www.ico.gov.uk).