



<b>Policy Name</b>	<b>Confidentiality Policy</b>
<b>Last reviewed</b>	<b>September 2021</b>
<b>Next Review</b>	<b>September 2022</b>
<b>Reviewed By:</b>	<b>HR</b>

### **Confidentiality Policy**

Active Fusion is committed to providing a confidential service to its users. No information given will be shared with any other organisation or individual without the user's expressed permission.

For the purpose of this policy, confidentiality relates to the transmission of personal, sensitive or identifiable information about individuals or organisations (confidential information), which comes into possession of Active Fusion through its work.

Active Fusion holds personal data about its staff, users, members etc. which will only be used for the purpose for which it was gathered and will not be disclosed to anyone outside of the organisation without prior permission.

All personal data will be dealt with sensitively and in the strictest confidence internally and externally.

#### **Purpose**

The purpose of the Confidentiality Policy is to ensure that all staff members, volunteers and users understand Active Fusion's requirements in relation to the disclosure of personal data and confidential information.

#### **Principles**

- All personal paper-based and electronic data must be stored in accordance with the Data Protection Act 1998 and must be secured against unauthorised access, accidental disclosure, loss or destruction.
- All personal paper-based and electronic data must only be accessible to those individuals authorised to have access.

#### **Records**

All records are kept in locked filing cabinets. All information relating to service users will be left in locked drawers. This includes notebooks, copies of correspondence and any other sources of information.

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## **Breaches of Confidentiality**

Active Fusion recognises that occasions may arise where individual workers feel they need to breach confidentiality. Confidential or sensitive information relating to an individual may be divulged where there is a risk of danger to an individual, a volunteer or employee, or the public at large, or where it is against the law to withhold it. In these circumstances, information may be divulged to external agencies e.g. police or social services on a need to know basis.

Where a worker feels that confidentiality should be breached the following steps should be taken:

- The worker should raise the matter immediately with their Line Manager.
- The worker must discuss with the Line Manager the issues involved in the case and explain why they feel confidentiality should be breached and what would be achieved by breaching confidentiality. The Line Manager should take a written note of this discussion.
- The Line Manager is responsible for discussing with the worker what options are available in each set of circumstances.
- The Line Manager is responsible for making a decision on whether confidentiality should be breached. If the Line Manager decides that confidentiality is to be breached, then they should take the following steps:

The Line Manager should contact the Director in the first instance. The Manager should brief the Director on the full facts of the case, ensuring they do not breach confidentiality in doing so. The Line Manager should seek authorisation to breach confidentiality from the Director.

If the Director agrees to breach confidentiality, a full written report on the case should be made and any action agreed undertaken. The Line Manager is responsible for ensuring all activities are actioned.

If the Director does not agree to breach confidentiality, then this is the final decision of the Organisation.

## **Legislative Framework**

Active Fusion will monitor this policy to ensure it meets statutory and legal requirements including the Data Protection Act, Children's Act, Rehabilitation of Offenders Act and Prevention of Terrorism Act. Training on the policy will include these aspects.

## **Ensuring the Effectiveness of the Policy**

All Trustee members and the Senior Leadership team will receive a copy of the confidentiality policy. Existing and new staff will be introduced to the confidentiality policy via induction and training. The policy will be reviewed annually and amendments will be proposed and agreed by the Trustees and Senior Leadership Team.

## **Non-adherence**

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Breaches of this policy will be dealt with under the Grievance and/or Disciplinary procedures as appropriate.