



## Achieve Inspire & Motivate CIC

### CONFIDENTIALITY POLICY

**Achieve Inspire & Motivate CIC** hereinafter referred to as 'the Organisation' is committed to providing a confidential service to its users. No information given to the Organisation 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 the possession of the Organisation through its work.

The Organisation holds personal data about its staff, users, members etc which will only be used for the purposes 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 the Organisation'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 2018 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.

## Statistical Recording

The Organisation is committed to effective statistical recording of the use of its services in order to monitor usage and performance.

All statistical records given to third parties, such as to support funding applications or monitoring reports for the local authority shall be produced in anonymous form, so individuals cannot be recognised.

## Records

All records are kept on the Organisation's Dropbox website, with local copies on individual Director's secure laptops.

Paper based records may be taken at workplace locations – these may include registers; these remain the property of the host organisation. This includes notebooks, copies of correspondence and any other sources of information

All information relating to service users is anonymised.

## Breaches of Confidentiality

The Organisation recognises that occasions may arise where individual Directors feel they need to breach confidentiality. Confidential or sensitive information relating to an individual may be divulged where there is risk of danger to the 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 Director feels confidentiality should be breached the following steps will be taken:

- They should raise the matter immediately with another Director.
- The Director must discuss the issues involved in the case and explain why they feel confidentiality should be breached and what would be achieved by breaching confidentiality. The other Director should take a written note of this discussion. This should include what options are available in each set of circumstances.
- If the two Directors jointly decide that confidentiality is to be breached then they should proceed with their agreed action and report these to the next Board meeting

## **Legislative Framework**

The Organisation 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 Board members will receive a copy of the confidentiality policy. New Directors will be introduced to the Confidentiality Policy via induction and training. The policy will be reviewed by the Board every three years and amendments will be proposed and agreed by the Board

## **Non-adherence**

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

Date of Policy Review: 21/10/2020  
Next Review of Policy: 01/10/2023