

Confidentiality Policy

1. Introduction

The policy gives members, employees, volunteers, and trustees as well as external stakeholders an assurance of confidentiality and integrity in our service.

The confidentiality policy exists for the protection of people and the organisation.

Confidentiality is a negotiated role between two or more parties that empowers the owner of information shared in direct negotiation, on distributing that information. It must be borne in mind that confidentiality means different things to different agencies and it is impossible to develop absolute rules for all situations. If in doubt ASK ...

2. General principles

- a. WAY Widowed and Young, recognises that colleagues (employees, volunteers, and trustees) 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 must exercise common sense and discretion in identifying whether this information should be communicated to others. Information given in confidence must not be disclosed without consent unless there is a justifiable reason e.g. a requirement of law or there is an overriding public interest to do so.
- b. Confidential information includes anything that contains the means to identify a person, e.g. name, address, postcode, date of birth, National Insurance Number, passport and bank details. It includes information about sexual life, beliefs, commission or alleged commission of offences and other sensitive personal information as defined by the Data Protection Act. It also includes information about organisations such as confidential business plans, financial information, contracts, trade secrets and procurement information.

3. Operational Practices

All colleagues must ensure that the following principles are adhered to;

- a. Person-identifiable or confidential information must be effectively protected against improper disclosure when it is received, stored, transmitted or disposed of.
- b. Access to person-identifiable or confidential information must be on a need-to-know basis.
- c. Disclosure of person identifiable or confidential information must be limited to that purpose for which it is required.
- d. Recipients of disclosed information must respect that it is given to them in confidence.
- e. Colleagues should seek advice from their line manager about confidentiality and sharing information as necessary.
- f. Colleagues will avoid exchanging personal information or comments about individuals with whom they have a professional relationship.
- g. Colleagues will avoid discussing confidential information about organisations or individuals in social settings.
- h. Colleagues will not disclose to anyone, other than their line manager, 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.

4. Keeping Records.

- a. Confidential records should be kept with the knowledge and consent of the individual whose records they are. They need to know where the records will be kept (e.g. in a secure place), and who will see them. Don't keep unnecessary records and destroy out of date or irrelevant records. All WAY Widowed and Young member records are stored online, members have access to their own profile which can be changed at any time.
- b. Third Party Suppliers - where information is shared by an individual directly with a WAY Widowed and Young third-party supplier, all confidential records will be held exclusively by them and will not be shared with WAY without the consent of the individual. The third-party suppliers policies and procedures will govern all records kept in these circumstances.

5. Clear Desk/Space policy

All staff should clear their desks at the end of each day. In particular they must keep all records containing person-identifiable or confidential information in recognised filing and storage places that are locked.

Unwanted printouts containing person-identifiable or confidential information must be destroyed utilising the appropriate means provided by WAY Widowed and Young.

6. Computer/System Use

Staff are responsible for ensuring that confidential data is not displayed on monitors where others can view. Passwords must be kept secure and must not be disclosed to unauthorised persons. Colleagues must not use someone else's password to gain access to information. Action of this kind will be viewed as a serious breach of confidentiality.

7. Duty to Disclose Information

There is a legal duty to disclose some information including:

- Children and vulnerable adults believed to be at risk of serious harm or abuse will be reported to the relevant statutory services
- Drug trafficking, money laundering or acts of terrorism will be disclosed to the police.

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 who will report it to the appropriate authorities.

Members should be informed of this disclosure unless this would put at risk the safety of any individual or jeopardise a potential criminal investigation. Details about disclosure of information and who has been informed will always be kept on record and stored securely with restricted access.

8. Breach of Confidentiality

Misuse of personal data and security incidents must be reported to line managers so that steps can be taken to rectify the problem and ensure that the same problem does not occur again.

This includes unauthorised access to person-identifiable information where a member of staff, or third party, does not have a need to know. It also includes incidents of information lying around in a public area, theft and loss of information

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, WAY Widowed and Young shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

9. Other relevant policies

The following policies of WAY Widowed and Young may also be relevant to Confidentiality matters:

- a. Data protection Policy
- b. Privacy Policy
- c. Safeguarding and Welfare Policy
- d. Complaints Policy

10. Changes to this Policy

WAY Widowed and Young, reserve the right to change this policy at any time. In which case the amended policy will be updated on our website and will apply from the date we post them.

The format and content of our website changes constantly. You should refresh your browser each time you visit our sites to ensure that you access the most up to date version.

11. Our Contact Details

We can be contacted in the following ways:

WAY Widowed and Young, Advantage House, Stowe Court, Stowe Street, Lichfield. WS13 6A.

enquiries@widowedandyoung.org.uk

12. Policy Control

Version	3	First Issue Date MM/YY	05/18	Last Review Date MM/YY	10/22	Next Review Date MM/YY	10/24
Signed (Chair or Trustee)	Agreed by WAY Trustees Meeting Date: 28th October 2023						

****END OF POLICY***