



Confidentiality Policy

Stratherrick & Foyers Community Trust (SFCT) is committed to maintaining confidentiality at all times. No personal information given to SFCT will be shared with another organisation or person, other than professionals involved in an individual's care, without the individual's expressed permission.

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

SFCT holds personal data about its staff, service users, volunteers etc which will only be used for the purposes for which it was gathered. All personal data will be dealt with sensitively and in the strictest confidence internally and externally.

PURPOSE

The purpose of this Policy is to ensure that all staff, volunteers and users understand SFCT requirements and obligations 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 General Data Protection Regulation 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

All statistical records given to third parties, such as to support funding applications, shall be produced in anonymous form, so individuals cannot be recognised.

RECORDS

All records are kept at the Administrators home address. This includes notes, copies of correspondence and any other sources of information. All financial documents are held by the Finance Officer.

BREACHES OF CONFIDENTIALITY

It will be considered a disciplinary matter for confidential information to be disclosed, other than to relevant professionals involved, or in the circumstances outlined below where a breach is authorised. Breaching confidentiality may be considered gross misconduct and therefore may lead to dismissal.

For the avoidance of doubt, a confidentiality breach includes but is not limited to:

- Allowing a third party to have access to confidential electronic or paper files
- Discussing confidential or sensitive personal information with a third party

- Accessing confidential information which is not a requirement of an individual's role

AUTHORISED BREACHES OF CONFIDENTIALITY

SFCT recognises that occasions may arise where individual employees or volunteers 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 an employee or volunteer feels confidentiality should be breached the following steps will be taken:

- The employee/volunteer should raise the matter immediately with a Manager or the relevant Director.
- The employee/volunteer must discuss with a Manager/Director the issues involved and explain why they feel confidentiality should be breached and what would be achieved by breaching confidentiality. The Manager/Director should take a written note of this discussion and is responsible for discussing with the employee/volunteer what options are available in each set of circumstances.
- The Manager/Director is responsible for making a decision on whether confidentiality should be breached, in consultation with other Trustees as necessary.

LEGISLATIVE FRAMEWORK

SFCT will monitor this policy to ensure it meets statutory and legal requirements including the UK Data Protection Act 2018.

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