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| HACRO CIO LOGO |

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**HACRO** Confidentiality Policy

Number : 1-7 rev 5

**Introduction**

Confidential information is secret and should be treated as such.

Confidentiality helps to build and develop trust between HACRO, staff and volunteers in their dealings with and for service users, participants, colleagues, donors and partners.

It acknowledges that an individual’s personal life and all the issues and problems that they have belong to them and them alone.

It potentially allows for the free flow of information between the client and worker and acknowledges that a client's personal life and all the issues and problems that they have belong to them.

It is recognised that HACRO works in a particularly sensitive field holding information about people that they would not wish to be disclosed as it could have a serious impact on their future lives, given the way that information can be rapidly and extensively disseminated electronically.

**Legislation**

The Data Protection Act 2018 controls how personal information is used by organisations such as HACRO and this is covered in the Privacy Statements No.s 4-1-1 and 4-1-2. This often referred to as GDPR – General Data Protection Regulation.

**Scope**

This policy affects all Trustees, employees and volunteers who may have access to confidential information. Only such information as is actually needed should be obtained and/or recorded. This will vary according to the project or circumstance. For Caring Dads, for example, it is necessary to have knowledge of the allegations against participants in order to be able to challenge their perceptions and beliefs. For WorkAbility it is not usually necessary to know about participants’ offending history.

Most of HACRO’s electronic communication is currently by non-secure email. There may be occasions when it is not appropriate to use personal details (including full names) in email correspondence.

Common examples of confidential information in HACRO are:

* Data of Service users, Participants, Partners and Donors including names and photographs
* Data of Members, Trustees (save for that required by law), Employees and Volunteers (existing and prospective)
* Participant lists (existing and prospective)
* Unpublished financial information
* Documents and processes explicitly marked as confidential.

**Confidentiality Measures**

* Store and lock paper documents
* Safeguard data bases and store on safe devices
* Restrict access to shared files such as Drop Box
* Only disclose information to colleagues when it is necessary and authorised
* Never disclose personal information without the written permission of the individual
* Shred confidential information when it is no longer required.
* Lock and secure confidential information at all times

**Exceptions**

* If a regulatory body requests it as part of an investigation or audit

**Discipline**

In the first instance, the complaint will be investigated by the staff member or manager responsible for the issue or person being complained about.

The Trustees will investigate every breach of this policy.

Willful or regular breach of the policy for personal gain will result in termination and possibly legal sanction.

Regular breach of this policy through negligence may also result in termination of employment.

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|  **Policy Review Record** |
| **Review Date** | **Reviewed By** | **Comment** |
| 20/01/20 | John Walker | New draft |
| 24/01/20  | Valerie Beale | Responsibilities |
| 25/01/20  | Valerie Beale |  |
| 03/02/20 | Andrew Bayram | Final incorporation |
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