

POLICY & PROCEDURE



SoLO
Life
Opportunities

38 Walnut Close
Chelmsley Wood
Birmingham
B37 7PU

Charity No. 1102297
England Company No.
5025939

Confidentiality

Category: Members/clients, tenants, Staff and Volunteers

Introduction

The purpose and objectives of a Confidentiality policy is to ensure that any information disclosed by a **member/client or tenant** or their parents/carers to a member of staff or volunteer of SoLO Life Opportunities (SoLO) is kept securely and access to it is carefully controlled and in line with the Data Protection Act.

SoLO's Data Protection Policy and Procedure **and GDPR Policy** must be followed with respect to all personal data.

Policy Statement

SoLO Life Opportunities is committed to providing a confidential service to its **members/clients or tenants** and their parents/carers and therefore promotes the Principles of Confidentiality throughout the organisation and aims to integrate confidentiality in all aspects of its services and management.

Members/clients, tenants and their parents and carers have a right to:

- be treated with dignity
- **have their privacy respected**
- decide how information about themselves should be shared with others

Confidentiality is between the individual and the organisation not between the individual and the member of staff or volunteer. This means that information will be treated in the utmost confidence and will not be divulged to anyone outside the organisation except where extenuating circumstances exist

(see below in section on sharing information). However, in order that we can provide the best possible help to our members it may be necessary to share information with a Line Manager or co-worker within SoLO.

Procedures

Sharing Information within the organisation - Information about a **member/client or tenant** should be on a 'need to know' basis. Information about the health and safety of the **member/client or tenant** should be disclosed in connection with the purpose of health & social welfare to those who would be unable to provide effective treatment/care without that information.

Loose talk – Avoid holding conversations in open/communal areas that refer to **members/clients or tenants**. This applies whether or not names are used. Always hold the individual's integrity in high regard.

Social Media – under no circumstances should any member of staff engage in social media discussion topics regarding SoLO **members/clients or tenants**.

Written Information – Ensure written notes are respectful **and factual**, remembering that **members/clients or tenants** or their carers have a right to read what is written. Whilst in use, ensure that written material is not left in a place where it could be read by others.

Use of personal contact information - In addition to this all staff/volunteers are responsible for checking if it is acceptable to telephone or write to the **member/client or tenant** or their parent/carer at home or work in relation to their case. Special arrangements are noted on the contact database. (SoLO operates a customer relationship management database which records all contacts details, including members as well as information that is relevant to welfare and best interests. It is a secure system that can only be accessed by password by authorised staff. Some important information such as needs, preferences or expectations may be highlighted by to minimise the risk of it being overlooked.)

Sharing Information with others outside of SoLO - Information will not be shared with other organisations or individuals without the **member/client or tenant** or their parents/carers (where appropriate) express permission, unless the information shared identifies any of the following;

- A risk of significant harm to any individual
- Where the safety and welfare of a vulnerable adult or child is in question.
- An Act of Terrorism
- Proceeds of Crime Act (Money Laundering or Benefit Fraud)

In these cases the protection of others takes precedence over the requirement for Confidentiality.

Expressed Consent - It is the responsibility of staff/volunteers to ensure that where action is agreed to be taken by the organisation on behalf of a **member/client or tenant** the member or their parent/carer must firstly give their consent, which should be recorded in the member's case records and on the SoLO database.

Rules of Disclosure

1. Make notes of events/discussions that took place as soon as possible after the time the information was shared.
2. Raise matter immediately with a Project Leader/Project Manager /**Senior Manager** or CEO
3. Ensure that there are written notes of any discussion taken place
4. Senior manager or CEO to make a decision on whether or not to contact social services and work within the Safeguarding policies.
5. CEO to brief the Chair on situation and Trustee responsible for safeguarding, taking care not to breach confidentiality. Ensure there is no discussion with other members of the Trustee Board who may have to resolve any future complaint about action taken.

Data Analysis - Data will be collected to assist in planning, marketing and supervision. Data collected will have the sole purpose of enabling SoLO to evaluate and monitor the service offered and will not, under any circumstances contain personal information.

In some instances, SoLO may wish to make information available to public bodies and the media about the kind of enquiries taken and the services on offer. In these cases personal information will only be used with the consent of the individuals concerned.

Effectiveness - All Trustee Board members will receive a copy of the Confidentiality Policy. Existing and new members of staff and volunteers will be introduced to the Confidentiality Policy via Induction and training. Training on this policy should be in conjunction with training on the **GDPR Policy** and any Information Sharing Agreements in place. The policy will be reviewed in accordance with the policy review procedures. Amendments should be proposed by the CEO and agreed by the Board.

This policy is closely linked to:

- Information Sharing Agreement
- Safeguarding and Vulnerable Adults Policies
- Social Media Policy
- **GDPR Policy**