



Somerford ARC Community Centre

20 Southey Road, Christchurch, BH23 3EH
01202 470770/ info@somerfordarc.com

Confidentiality Policy

General Statement of Policy

Somerford ARC recognises that employees, volunteers, and trustees gain information about individuals and Organisations during their work or activities. In most cases such information will not be stated as confidential, and employees and volunteers may have to exercise common sense and discretion in identifying whether information is expected to be confidential. This policy aims to give guidance but if in doubt, seek advice from your Office Manager.

This policy is to be reviewed every two years.

1. General principles

- 1.1. Somerford ARC Community Centre employees and volunteers may gain information about Somerford ARC Community Centre such as plans and finances. This information must **not** be shared with any parties outside the Organisation.
- 1.2. All visitors to the Centre are entitled to privacy and can specifically request to be seen in private.
- 1.3. Employees and volunteers can share information with their Office Manager or Trustees to discuss issues and seek advice.
- 1.4. Employees and Volunteers should avoid exchanging personal information or comments (gossip) about individuals with whom they have a professional relationship.
- 1.5. As part of the Somerford ARC Community Centre Equality Policy it is not appropriate to discuss a person's sexuality (i.e., 'outing' a gay person, disability, their gender reassignment) without their prior consent.
- 1.6. Employees and volunteers should avoid talking about the Organisation or individuals in social settings.
- 1.7. Information considered sensitive, personal, or private will not be shared with anyone other than the Office Manager or Trustees without the consent of the individual.
- 1.8. Constructive liaison with other agencies is sometimes essential if individuals and groups are to be offered an effective service by Somerford ARC Community Centre. However, confidential matters must not be discussed outside of Somerford ARC Community Centre without the prior permission of the individual or Organisation.
- 1.9. Where there is a legal duty on Somerford ARC Community Centre to disclose information, the person to whom the confidentiality is owed will be informed that disclosure has or will be made.

2. Why information is held

- 2.1. Most information held by Somerford ARC Community Centre relates to voluntary and Community Organisations, self- help groups, volunteers, employees, Trustees, or services which support or fund them.
- 2.2. Information may be kept enabling Somerford ARC Community Centre to understand the history and activities of Organisations to deliver the most appropriate services.



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- 2.3. Somerford ARC Community Centre does need to share information where appropriate about the impact of our services. If one of our services has an outcome which would provide useful material for publicity, reporting or training purposes, then wherever possible the permission of the individual will be sought using a disclosure form before any action is taken. If permission cannot be obtained, then details must be amended to protect the identity of the individual.
- 2.4. Somerford ARC Community Centre has a role in putting people in touch with voluntary and Community Organisations and keeps contact details which are passed on to any enquirer, except where the group or organisation expressly requests that the details remain confidential.
- 2.5. Information about ethnicity and disability of users is only kept for the purposes of monitoring our equal opportunities policy and for reporting back to funders.
- 2.6. Somerford ARC Community centre has a role to put individuals in touch with Community Organisations. Contact details will only be disclosed to services with the user's permission, using a disclosure form.

3. Access to information

- 3.1. Information is confidential to Somerford ARC Community Centre as an organisation but may be passed to employees, the Office Manager or Trustees to ensure the best quality service.
- 3.2. Where information is sensitive, i.e. it involves disputes or legal issues, it will be confidential to the employee dealing with the case and their Office Manager. Such information should be clearly labelled 'Confidential' and should state the names of the employees entitled to access the information and the name of the individual or group who may request access to the information. This should be stored in a lockable filing cabinet.
- 3.3. Employees will not withhold information from their Office Manager and Trustees unless it is purely personal.
- 3.4. Individuals may have sight of Somerford ARC Community Centre records held in their name or that of their Organisation. The request must be given in writing to the Office Manager giving 14 days' notice and be signed by the individual, or in the case of an organisation's records, by the Chairman or Office Manager. Sensitive information as outlined in paragraph 3.2 will only be made available to the person or organisation named on the file.
- 3.5. When photocopying or working on confidential documents, employees and volunteers must ensure they are not seen by people in passing. This also applies to information on computer screens.

4. Storing information

- 4.1. Somerford ARC Community Centre keeps non-confidential information using paper files and computers.
- 4.2. Confidential information is stored in locked filing cabinets and stored accordingly to the Data Protection policy of Somerford ARC Community Centre.
- 4.3. Information about volunteers and other individuals will be kept by the employee personally responsible. These colleagues must ensure management know how to gain access.
- 4.4. Employees' personnel information will be kept in lockable filing cabinets in accordance with the Somerford ARC Community Centre data protection policy and will be accessible to the Office Staff or to those who are entitled to see it as part of their duties.



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- 4.5. Filing cabinet drawers holding confidential information should always be labelled 'confidential' and remain locked.
- 4.6. Electronic files will be stored safely on One Drive in accordance with the Somerford ARC Community Centre Password Policy.
- 4.7. The time in what information is stored is in accordance with the Somerford ARC Community Centre Retention of Information Policy.
- 4.8. Somerford ARC Community Centre reserves the right to break confidentiality if:
 - If it is believed an individual is a danger to themselves or others.
 - If an employee or volunteer suspects abuse or has knowledge of abuse.
 - If an individual gives information indicating that a crime has been committed.
 - If a disclosure is required by Law.
 - If it is felt an individual has the capacity to make a decision. Action will only be made in the best interests of the individual.
- 4.9. Breaking confidentiality will be done so on a case by case basis.
- 4.10. Individuals should be informed of disclosures.

5. Duty to disclose information

- 5.1. There is a legal duty to disclose some information including:
 - Child abuse will be reported to the Children, Schools and Families Department
 - Drug trafficking, money laundering, acts of terrorism or treason will be disclosed to the police.
- 5.2. In addition, a colleague believing an illegal act has taken place, or that a user is at risk of harming themselves or others, must report this to the Officer Manager and Trustees who will report it to the appropriate authorities.
- 5.3. Service users should be informed of this disclosure.

6. Disclosures

- 6.1. Somerford ARC complies fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.
- 6.2. Disclosure information is always kept separately from an applicant's personnel file in secure storage with access limited to those who are entitled to see it as part of their duties. It is a **criminal offence** to pass this information to anyone who is not entitled to receive it.
- 6.3. Documents will be kept for one year and then destroyed by secure means. Photocopies will not be kept. However, Somerford ARC may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.



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7. Data Protection Act

7.1. Information about individuals, both paper and electronic must be done so in accordance with the Somerford ARC Community Centre's Data Protection Policy which is based on the following data protection principles:

- Obtained and processed fairly and lawfully.
- Held only for specific purposes.
- Adequate relevant and not excessive.
- Accurate and up to date.
- Not kept longer than necessary.
- Kept secure and protected.
- Not transferred outside of Europe.

8. Breach of Confidentiality

- 8.1. Employees and volunteers who are dissatisfied with the conduct or actions of other employees or Somerford ARC Community Centre should raise this with their Office Manager or Trustees using the Somerford ARC Community Centre Grievance Procedure, if necessary, and not discuss their dissatisfaction outside the Organisation. This does not prevent an employee taking appropriate action in accordance with the Somerford ARC Community Centre Whistleblowing Policy and provided that a breach of confidentiality is reasonable and in accordance with that policy no disciplinary sanction will result from it.
- 8.2. Employees and volunteers accessing unauthorised files or breaching confidentiality may face disciplinary action. Ex- employees and volunteers breaching confidentiality may face legal action.

Associated Policies and Procedures:

- Data Protection Policy
- Social Media Policy
- Whistleblowing Policy
- Conflicts of Interest, Gifts, and Bribery Policy
- Retention of Information Policy

Reviewed April 2022

Signed:

Print Name: Paul Hilliard

Role: Chairman

Date: 25/10/2022