



# Stantonbury Ecumenical Partnership Confidentiality Policy

## Scope

This document explains the confidentiality policy in terms of

- General Principles
- Why information is held
- Access to Information
- Storing information
- Duty to disclose information
- Disclosures
- Breach of confidentiality
- Whistleblowing

This policy is to be read in conjunction with the Whistleblowing policy and the General Privacy Notice.

This policy was adopted from Churches Together in Milton Keynes.

## Who it applies to

Any of the Partnership's staff, trustees and volunteers who have access to personal information about individuals in the Partnership.

## Date of approval

By SEPC

Date 23 November 2023

By Trustees

Date 6 February 2024

Review date    October 2026

# Stantonbury Ecumenical Partnership (SEP) Confidentiality Policy

## 1. General principles

- 1.1. SEP recognises that employees, volunteers and trustees gain information about individuals and organisations. In most cases such information will not be stated as confidential and colleagues may have to exercise common sense and discretion in identifying whether information is expected to be confidential.
- 1.2. Colleagues are able to share information with SEP trustees or Partnership council members in order to discuss issues and seek advice.
- 1.3. Colleagues should avoid exchanging personal information or comments (gossip) about individuals.
- 1.4. It is not appropriate to discuss a person's sexuality (i.e., 'outing' a gay person) without their prior consent.
- 1.5. Colleagues should avoid revealing confidential information about organisations or individuals in social settings.
- 1.6. Information given to anyone acting on behalf of SEP is considered to be given to SEP as an agency rather than to the individual staff member or volunteer.
- 1.7. Constructive liaison with other agencies is sometimes essential. However, confidential matters must not be discussed outside of SEP without the prior permission of the individual or organisation.
- 1.8. Where there is a legal duty on SEP to disclose information, the person to whom the confidentiality is owed will be informed that disclosure has or will be made.

## Why information is held

- 1.9. Most information held by SEP relates to voluntary and community organisations, self-help groups, volunteers, employees, trustees or services which support or fund them.
- 1.10. Information may be kept to enable SEP to understand the history and activities of organisations
- 1.11. SEP 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.
- 1.12. Information about ethnicity and disability of users is only kept for the purposes of ensuring compliance with equal opportunities legislation and also for reporting back to funders.

## 2. Access to information

- 2.1. Information is confidential to SEP as an organisation but may be passed to colleagues, or trustees.

- 2.2. Where information is sensitive, i.e., it involves disputes or legal issues, it will be confidential to the individual and the relevant officer. Such information should be clearly labelled 'Confidential' and should state the names of the colleagues entitled to access the information and the name of the individual or group who may request access to the information.
- 2.3. Colleagues will not withhold information from those with specific relevant roles unless it is purely personal.
- 2.4. Members may have sight of SEP records which include their name or that of their organisation. The request must be in writing to the SEP Trustees, giving 14 days' notice and be signed by the individual, or in the case of an organisation's records, by the Chair or other designated person. Sensitive information as outlined in para 3.2 will only be made available to the person or organisation named on the file.
- 2.5. When photocopying or working on confidential documents, colleagues must ensure they are not seen by people in passing. This also applies to information on computer screens.

### **3. Storing information**

- 3.1. SEP keeps non-confidential information using paper files and computers. Confidential information is maintained with an appropriate level of security, in accordance with the Data Protection Act and this policy, which will adequately protect information about individuals that is held in the systems.
- 3.2. Employees' personnel information will be kept in filing cabinets and will be accessible to the Chair or those who are entitled to see it as part of their duties.
- 3.3. In an emergency situation, the Chair may authorise access to files by other people.

### **4. Duty to disclose information**

- 4.1. There is a legal duty to disclose some information including:
  - 4.1.1. Child abuse will be reported to the Children, Schools and Families Department
  - 4.1.2. Drug trafficking, sexual abuse, money laundering, terrorism or treason will be disclosed to the police.
- 4.2. Anyone believing an illegal act has taken place, or that a person is at risk of harming themselves or others, must report this to the Chair, who will report it to the appropriate authorities.
- 4.3. Users should be informed of this disclosure.

### **6. Disclosures**

- 6.1 SEP 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 relating to a disclosure will be kept for a year and then destroyed by secure means, unless required for legal reasons or in the case of an ongoing complaint. Photocopies will not be kept. However, SEP 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.

## **7. Breach of confidentiality**

- 7.1. Employees who are dissatisfied with the conduct or actions of other colleagues or SEP should raise this with the relevant officer using the grievance procedure, if necessary, and not discuss their dissatisfaction outside of SEP.
- 7.2. Colleagues accessing unauthorised files or breaching confidentiality will face disciplinary action. Ex-employees breaching confidentiality may face legal action.

## **8. Whistle-blowing**

- 8.1 Please refer to the Whistleblowing Policy.