

<b>Document Name:</b>	<b>Confidentiality Policy</b>	
Approved by Board of Trustees on:	06 September 2018	
Review Schedule	Every two years	
Last Reviewed	February 2020	
Next review due	February 2022	
Owner (Responsibility)	Chief Executive Officer (CEO)	

  

**Document Description:**

The Confidentiality Policy sets out the practices and procedures of Age UK Wiltshire on the disclosure of personal information relating to clients. This Policy is there to protect the interests of clients and to ensure that they can have trust and confidence in Age UK Wiltshire and that their dignity is respected. It also protects Age UK Wiltshire, its trustees, staff and volunteers and complies with data protection law.

  

**Implementation & Quality Assurance**

Implementation is immediate and this Policy shall stay in force until any alterations are formally agreed. The Policy will be reviewed every two years by the Board of Trustees, or sooner if legislation, best practice or other circumstances indicate this is necessary.

  

**Revision History**

Revision date	Summary of Changes	Other Comments

## Glossary of Terms

**AUKW** – Age UK Wiltshire

**Board** – Board of Trustees, the collective term for all Trustees (see below)

**Casual Workers** – the paid personnel of the charity with a Terms of Engagement rather than a contract of employment, their terms and conditions differ from those of employees; distinct from employees

**CEO** – Chief Executive Officer, the most senior paid employee within the charity, accountable to the Board of Trustees

**the Charity** – Age UK Wiltshire

**CharityLog** – the database used to record & store details of AUKW clients, staff, volunteers, Trustees and other contacts

**Client** – an individual in receipt of support from one or more of AUKW services

**DBS** – Disclosure and Barring Service; used to refer to the check made on an individual to ensure they are suitable to work with vulnerable individuals

**Employees** – the paid personnel of the charity with a Contract of Employment, whether that be permanent, temporary or fixed term; distinct from Casual Workers

**FRSC** – Finance and Resources Sub Committee – a sub-committee of the Board

**GSC** – Governance Sub Committee – a sub-committee of the Board

**Leadership Team (LT)** – comprises the members of the SLT PLUS the Area Manager, Programmes Manager and Fundraising and Partnerships Manager

**Senior Leadership Team (SLT)** – comprises the CEO, Director of Services, Director of Paid for Services and Finance Manager

**Staff** – collective term for all paid personnel within the charity irrespective of their contract type; includes both employees and casual workers

**Trustees** - The people who share ultimate responsibility for governing the charity and directing how it is managed and run. The Trustees are legally responsible for the charity. Trustees are volunteers and are not paid other than reimbursement of expenses.

**Volunteers** – the unpaid personnel of the charity, volunteers give their time freely and are not obliged to do work for the charity, equally the charity is not obliged to provide them with work, volunteers do not have rights under employment law

## 1. About this policy

### 1.1. Reasons for this Policy Statement:

- to protect the interests of clients;
- to ensure all clients have trust and confidence in Age UK Wiltshire (AUKW) and that their dignity is respected;
- to protect Age UK Wiltshire, its trustees, staff and volunteers;
- to comply with data protection law.

### 1.2. Its meaning:

- staff and volunteers receiving personal information about services users, their carers and families, should treat this information as confidential;
- under no circumstances should staff and volunteers share personal information with their own partners, family or friends.

## 2. Age UK Wiltshire will seek to ensure that:

2.1. All personal information will be treated as confidential. Information will only be collected that is necessary and relevant to the work in hand. It will be stored securely, only accessible on a need to know basis to those members of staff and volunteers duly authorised. The retention periods of personal information are covered in the retention section of the Data Protection Policy which should be read in conjunction with this Policy.

2.2. Clients requesting ongoing individual support will be asked to sign and date a data consent form, or in the case of Information and Advice, or an urgent situation, to give their verbal consent. This will authorise Age UK Wiltshire to:

- keep written and/or computerised records of the client's personal details and the work done on their behalf;
- share information with other agencies under the following circumstances:
  - to ensure the safety and welfare of the client
    - where such information is relevant to the care arrangements and specific requirements of the client;
    - where such information is required to ensure the safety and welfare of the persons concerned in the care of the client;
    - to protect the safety and welfare of a child or other adult who may be at risk within the household.

2.3 Where consent is not given for AUKW to record and store basic information about the client, it is unlikely that a service will be able to be provided.

2.4 Where consent is not given for AUKW to share information externally, a service will be provided and information shared only where there are immediate concerns about potential abuse or physical harm, or where an indictable offence may have been committed. In such cases, agreement will be sought from the Chief Executive Officer, or, in his or her absence, a senior manager to share information with relevant agencies.

2.5 All information stored in Charitylog will be kept secure and treated as confidential.

2.6 Paper records will be kept in a locked cabinet with restricted access.

2.7 The signed consent form will be stored on the client's record.

2.8 All clients will be made aware of their right of access to their records.

2.9 Every effort will be made to ensure that the physical environment in which face to face discussions and telephone conversations take place, does not compromise client confidentiality.

2.10 Clients will be made aware of their right to complain if they feel confidentiality has been breached.

2.11 Breaches of confidentiality will be dealt with through Age UK Wiltshire's staff and volunteer Disciplinary Procedures.

### **3. Glossary**

3.1. Personal Information means both:

- The data protection definition which specifies any information which enables a living person to be identified, such as name, address, phone number, email address, NHS number etc. or Special Categories of Personal Data, which requires the individual's explicit consent for it to be held by AUKW, such as ethnicity, sexuality, political interests, religious beliefs, trade union affiliations etc.
- Information, written or verbal, about a client that relates to their health, circumstances, family or experiences that is either provided for context so that a personalised service can be provided, and/or information that is ascertained directly as a result of contact with the client.