



NoOffence!

Confidentiality Policy

This policy applies to all staff, volunteers and partners of NoOffence! CIC.

1. Introduction

- 1.1. The data covered by the confidentiality policy includes:
 - 1.1.1. Information about the organisation, for example, its plans or finances
 - 1.1.2. Information about other organisations
 - 1.1.3. Information about individuals, for example, members, volunteers and staff whether recorded electronically or in paper form
- 1.2. All staff, volunteers, partners and others who work at NoOffence! CIC must respect the need for confidentiality of information held about anyone who comes into contact with the organisation, and about any NoOffence! CIC business. This is expected to continue even when contact has ceased with this person, and when the volunteer or staff member no longer works for NoOffence! CIC.
- 1.3. This policy should be read in conjunction with the NoOffence! CIC's Data Protection Policy.

2. Information about individuals

- 2.1. NoOffence! CIC is committed to ensuring confidential services to all individuals. The confidentiality is between the individual and the organisation, not the members of staff delivering a particular service.
- 2.2. Confidential information will not be sought from a member unless expressly in the interests of that member, i.e. to enable a better service delivery.
- 2.3. Information will only be passed to another agency or to other individuals outside of the organisation with the consent of the member, where possible this will be with written consent. If a member of staff or volunteer intends to get information from another agency to help the member or to refer them to another agency then this must be explained to the member and their permission given.



NoOffence!

- 2.4. No personal information about staff, volunteers or members will be given to any third party including a member of their family, without the consent of the member. Information will only be divulged on a “need to know” basis.
- 2.5. Information will be treated in confidence and will not be divulged to anyone outside the organisation except where extenuating circumstances exist (see below).

However, in order that we can provide the best possible help to our members it may be necessary to share information with a manager or colleagues within NoOffence! CIC.

- 2.6. In no circumstances should details of a member be discussed by anyone outside of the organisation or in an open plan area in such a manner that it is possible to identify the member.
- 2.7. Staff , partners and volunteers should take due care and attention when speaking to members and using the telephone or fax. No third party should be able to hear a conversation or personal details of another member.

3. Use of member information for publicity, reporting or training purposes

- 3.1. NoOffence! CIC does need to be able to give information where appropriate about the impact of our services.
- 3.2. 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 member will be sought in writing before the story is told to anyone else. If permission cannot be obtained then any details that would enable identification of the member to be made will be changed.



NoOffence!

4. Limits to member confidentiality

- 4.1. In certain circumstances NoOffence! CIC reserves the right to break confidentiality should this be deemed necessary. These circumstances include:
 - 4.1.1. If a member of staff believes that a member could cause danger to themselves or to others.
 - 4.1.2. If a member of staff suspects abuse or has knowledge of abuse
 - 4.1.3. If the member gives information which indicates that a crime has been committed
 - 4.1.4. If disclosure is required by law, for example, by the police
 - 4.1.5. If a person is felt to lack the mental capacity to make a decision. In such cases staff or volunteers will discuss with a manager and they will only act in the member's best interest.
 - 4.1.6. If the member gives information which indicates a possible terrorist threat.
- 4.2. The decision on whether to break confidentiality will be decided on a case-by-case basis and always in conjunction with a manager.

5. Access to data

- 5.1. This Policy operates on a "need to know" basis and apart from staff and volunteers in the office of NoOffence! CIC, no-one will have access to member or organisational information unless it is relevant to the service or their work.
- 5.2. All members have the right to request access to all information stored about them, and have a right to see a copy of this confidentiality policy on request.
- 5.3. If any party concerned has a sensory or physical impairment, efforts should be made to ensure that all aspects of this policy and exchanges between parties are understood.
- 5.4. Significant breaches of this policy will be handled under NoOffence! CIC's disciplinary procedures.



NoOffence!

6. Evaluation and Monitoring

- 6.1. All staff , partners and volunteers will be given a copy of the policy when they join NoOffence! CIC and will sign the confidentiality statement that they will abide by this policy. NoOffence! CIC will ensure that all staff and volunteers are trained in the application of this policy.

- 6.2. The policy will be reviewed in January 2016 by the Chief Executive. It will also be reviewed in response to changes in relevant legislation, contractual arrangements, good practice or in response to an identified failing in its effectiveness.

Approved by: Chief Executive, 5th January 2015

Review date: January 2016



NoOffence!

Confidentiality Statement for Staff, Partners and Volunteers

1. When working for NoOffence! CIC, you will often need to have access to confidential information which may include, for example:
 - 1.1. Personal information about individuals who are members or otherwise involved in the activities organised by NoOffence! CIC.
 - 1.2. Information about the internal business of NoOffence! CIC.
 - 1.3. Personal information about staff or volunteers working for NoOffence! CIC.
2. NoOffence! CIC is committed to keeping this information confidential, in order to protect people and NoOffence! CIC itself. 'Confidential' means that all access to information must be on a "need to know" basis and properly authorised basis. You must use only the information you have been authorised to use, and for purposes that have been authorised. You should also be aware that under the Data Protection Act, unauthorised access to data about individuals is a criminal offence.
3. You must assume that information is confidential unless you know that it is intended by NoOffence! CIC to be made public. Passing information between a branch and the UK office, or between NoOffence! CIC and a mailing house, or vice versa does not count as making it public, but passing information to another organisation does count.
4. You must also be particularly careful not to disclose confidential information to unauthorised people or cause a breach of security. In particular you must:
 - 4.1. Not compromise or seek to evade security measures (including computer passwords);
 - 4.2. Be particularly careful when sending information to other agencies and organisations;
 - 4.3. Not gossip about confidential information, either with colleagues or people outside NoOffence! CIC;
 - 4.4. Not disclose information — especially over the telephone — unless you are sure that you know who you are disclosing it to, and that they are authorised to have it.



NoOffence!

5. If you are in doubt about whether to disclose information or not, do not guess. Withhold the information while you check with an appropriate person whether the disclosure is appropriate.
6. Your confidentiality obligations continue to apply indefinitely after you have stopped working or volunteering for NoOffence! CIC.

**I have read and understand the above statement and the Confidentiality Policy.
I accept my responsibilities regarding confidentiality.**

Signed:

Date: