

CONFIDENTIALITY POLICY DOLMA FOUNDATION



DOLMA FOUNDATION hereinafter referred to as 'The Organization' is committed to providing a confidential service to its users. No information given to the Organization will be shared with any other organization or individual without the user's expressed permission.

For the purpose of this policy, confidentiality relates to the transmission of personal, sensitive or identifiable information about individuals or organizations (confidential information), which comes into the possession of the Organization through its work.

The Organization holds personal data about its staff, users, members etc which will only be used for the purposes for which it was gathered and will not be disclosed to anyone outside of the organization without prior permission.

All personal data will be dealt with sensitively and in the strictest confidence internally and externally.

Purpose

The purpose of the Confidentiality Policy is to ensure that all staff, members, volunteers and users understand the Organizations requirements in relation to the disclosure of personal data and confidential information.

Principles

- All personal paper-based and electronic data must be stored in accordance with the Data Protection Act 1998 and must be secured against unauthorized access, accidental disclosure, loss or destruction.
- All personal paper-based and electronic data must only be accessible to those individuals authorized to have access.

Statistical Recording

The Organization is committed to effective statistical recording of the use of its services in order to monitor usage and performance. All statistical records given to third parties, such as to support funding applications or monitoring reports for the local authority shall be produced in anonymous form, so individuals cannot be recognized.

Records

All records are kept in locked filing cabinets. All information relating to service users will be left in locked drawers. This includes notebooks, copies of correspondence and any other sources of information.

Breaches of Confidentiality

The Organization recognizes that occasions may arise where individual workers feel they need to breach confidentiality. Confidential or sensitive information relating to an individual may be divulged where there is risk of danger to the individual, vulnerable community or population, a volunteer or employee, or the public at large, or where it is against the law to withhold it. In these circumstances, information may be divulged to external agencies e.g. police or Charity commission on a need to know basis.

Where worker feels confidentiality should be breached the following steps will be taken:

- The worker should raise the matter immediately with their Line Manager.

- The worker must discuss with the Line Manager the issues involved in the case and explain why they feel confidentiality should be breached and what would be achieved by breaching confidentiality. The Line Manager should take a written note of this discussion.
- The Line Manager is responsible for discussing with the worker what options are available in each set of circumstances.
- The Line Manager is responsible for making a decision on whether confidentiality should be breached. If the Line Manager decides that confidentiality is to be breached then they should take the following steps:

The Line Manager should contact the Chairman in the first instance, or any of the Board Members/ Trustee. The Manager should brief the Chairman/Board Member/Trustee on the full facts of the case, ensuring they do not breach confidentiality in doing so. The Line Manager should seek authorization to breach confidentiality from the Chair/Board Member/ Trustee.

If the Chairman/Board Member/Trustee agrees to breach confidentiality, a full written report on the case should be made and any action agreed undertaken. The Line Manager is responsible for ensuring all activities are in action.

If the Chairman/Board Member/Trustee does not agree to breach confidentiality then this is the final decision of **DOLMA FOUNDATION**.

Legislative Framework

The Organization will monitor this policy to ensure it meets statutory and legal requirements including the Data Protection Act, Children's Act, Rehabilitation of Offenders Act and Prevention of Terrorism Act and any other Compliance Policy which are in place. Training on the policy will include these aspects.

Ensuring the Effectiveness of the Policy

All Board Members/Trustee will receive a copy of the confidentiality policy. Existing and new workers will be introduced to the confidentiality policy via induction and training. The policy will be reviewed annually and amendments will be proposed and agreed by the Board Members/Trustee.

Non-adherence

Breaches of this policy will be dealt with under the Grievance and/or Disciplinary procedures as appropriate.