



Confidentiality Policy

1 Statement of Policy

The SUN network's policy is based on the principles that:

Every individual involved with the organisation has the right to confidentiality and respect.

In the course of its work The SUN network will be in possession of confidential information about individuals involved with the organisation and will do its utmost to protect that confidentiality. Any information obtained about individuals, which could reasonably be expected to be confidential, will be stored securely and only used for the purpose for which it was intended.

The SUN network may be required to share confidential information with others for the purposes of ensuring public or personal safety. Depending on the circumstances of the situation The SUN network will either endeavour to obtain the individual's permission before sharing confidential information with others or we will endeavour to inform them we have done so, or will do so. Individuals will have access to information held about them.

Information will be regarded as having been given in confidence to The SUN network as an organisation rather than to specific individuals or staff members.

2 Context

This policy relates to all individuals who are involved in the work of The SUN network. This includes members, staff, sessional workers, members of the public, volunteers and directors.

It is governed by all relevant national legislation, guidance, policy and procedures eg The Data Protection Act (1998) The Children's Act (2000), The Human Rights Act (1998) Rehabilitation of Offenders Act, The Policy and Criminal Evidence Act (1994), legislation relating to Employment, the Freedom of Information Act, and The SUN network's policies and procedures regarding the Safeguarding of Vulnerable Adults and Children.

In order to implement this policy, The SUN network undertakes to put procedures in place that will:

Register and comply with the Information Commission Requirements for data protection and storage of information.

- Ensure each service area has specific procedures and guidance to deal with any particular requirements that are not contained within this document.
- Ensure that all confidential information is held securely
- Ensure that all obsolete or irrelevant material is disposed of in an appropriate and secure way.

The SUN Network Cambridgeshire and Peterborough

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- Comply with legislation that relates to the security and disclosure of information. There may be times when it is considered that there is significant risk posed to the individual concerned or to others and that disclosure without permission is necessary. In this case information may need to be shared with those agencies, Health, Social Services or the Police whose duty it is to ensure personal and public safety.
- Endeavour to gain the individual's permission in writing before disclosing information about them to third parties wherever practicable.
- If consent is not given, or where consent has not been obtained for other reasons we will inform the individual, where possible, what information has been shared with a third party.
- Ensure that information is only exchanged with other agencies on a need to know basis. Wherever possible breaches of confidentiality concerning members will be agreed and documented through the line management structure before action is taken.

3 Ensuring the Effectiveness of this Policy

The SUN network seeks to develop and comply with nationally and locally accepted good practice and quality assurance standards; it will do this by ensuring that new staff members, sessional workers, volunteers and directors are made aware of the confidentiality policy and all related procedures at the earliest opportunity. They will sign to indicate that they have read them, that they understand them and undertake to abide by their provision.

The SUN network will also:

- Develop and maintain protocols for sharing information with partnership organisations, such as statutory organisations, GPs etc.
- Provide regular training for staff, to ensure that any new legislation or procedures are incorporated into practice. Provide regular supervision for staff and volunteers to facilitate discussion around boundaries and the use of appropriate channels for communication of information.
- Liaise with members to ensure that their perception on confidentiality is taken into consideration in policy review and formulation.
- Review this policy annually or in line with major legislative changes.

It may be necessary to formulate other separate confidentiality statements that are relevant to specific circumstances within the SUN network's overall provision. These will be appended to the existing policy document. Appendices or amendments will be proposed and agreed by the Board of Directors before being adopted.



Approved by The SUN Network Board of Directors Date: 23 April 2018

Next Review Date: April 2020

Responsible Officer Executive Director of The SUN Network.

Signed:..... Date:.....

Signed..... Date:.....

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Appendix 1

CONFIDENTIALITY MEMBER POLICY STATEMENT

The SUN network's policy is based on the principles that:

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- The SUN network may be required to share confidential information with others for the purpose of ensuring public or personal safety (please refer to the Safeguarding of Vulnerable Adults Policy and the Child Protection Policy). Depending on the circumstances, the SUN network will either endeavour to obtain your written permission before sharing confidential information with others or we will endeavour to inform you when we have done so.
- Individuals can have access to information held about them by the SUN network. Requests should be made in writing to the Director who will ask a member of staff to arrange a time for you to view any information held on you.
- Information will be regarded as having been given in confidence to the SUN network as an organisation rather than to specific individuals or staff members.
- Information you hear from other members should be treated as confidential – it should not be shared or discussed outside of the groups you attend.
- If another member tells you privately information about themselves that cause you concern because of potential risk issues, you should inform a member of staff immediately.
- The Sun Network's remit includes the provision of reports to several agencies about people's experience of services. Such reports must be anonymised. In special cases where reports are to be shared where individuals are identifiable this will only be done with the express permission of such individuals.



Appendix 2

Document Retention Periods	
Governance Processes	
Board Meetings: <ul style="list-style-type: none"> • Minute Books • Handwritten Notes from Meetings 	Permanent Dispose once minutes approved at next meeting
Strategy and Reporting: <ul style="list-style-type: none"> • Annual Reports • Annual Statement of Accounts • Strategic processes and resolutions 	Permanent Permanent 3 years after last action
Financial Management	
Accounts and Audit: <ul style="list-style-type: none"> • Auditors Reports/Final Letters • Audit of Accounts • General Audit Correspondence 	6 years + current 6 years + current 2 years + current
Financial Transactions: <ul style="list-style-type: none"> • Budget Monitoring <ul style="list-style-type: none"> • Invoice Copies 	6 years + current 6 years + current
Payroll: <ul style="list-style-type: none"> • Salary records • SSP records • Maternity Pay records 	6 years + current 3 years after tax year to which they relate 3 years after tax year to which they relate
Human Resources	
Appointments – Staff and Board: <ul style="list-style-type: none"> • Successful • Unsuccessful 	6 years after employment ceases 2 years after appointment of successful candidate
Personnel administration: <ul style="list-style-type: none"> • Accident Book • Correspondence • Expense claims 	3 years 6 years + current 6 years + current

<ul style="list-style-type: none"> • Pensions • Personal Development Reviews <ul style="list-style-type: none"> • Register of Interests 	<p>years after employment ceases</p> <p>6 years after employment cease</p> <p>6 years + current</p>
<p>Training and Development:</p> <ul style="list-style-type: none"> • Training records – Staff and Board 	<p>6 years + current</p>
<p>Volunteers</p>	
<p>Appointments, Training and Correspondence</p>	<p>1 year after resignation</p>
<p>Management and Administration</p>	
<p>Correspondence:</p> <ul style="list-style-type: none"> • General <ul style="list-style-type: none"> • Board 	<p>2 years + current</p> <p>2 years + current</p>
<p>Complaints</p>	<p>6 years</p>
<p>Consultation:</p> <ul style="list-style-type: none"> • Surveys and summaries of findings 	<p>5 years after closure</p>
<p>Five Values Reviews:</p> <ul style="list-style-type: none"> • Reports • Correspondence <ul style="list-style-type: none"> • Complaints 	<p>Permanent</p> <p>3 years + current</p> <p>6 years</p>
<p>Information Management:</p> <ul style="list-style-type: none"> • Gifts and Hospitality Records • Information Retention and Disposal Register 	<p>6 years + current</p> <p>Permanent</p>
<p>Legal and Contracts:</p> <ul style="list-style-type: none"> • Insurance • Service Level Agreements Shared Agreements 	<p>7 years after last action</p> <p>2 years after contract expiry</p> <p>2 years after agreement expiry</p>
<p>Media Relations:</p> <ul style="list-style-type: none"> • Press cuttings • Media Reports 	<p>Permanent</p> <p>Permanent</p>

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Policies and Procedures	Permanent
Other <ul style="list-style-type: none"> • Individual records • Correspondence • Reports 	2 years 2 years 2 years