



## **Bridging the Gap (Manchester) Confidentiality Policy**

Registration number/charity number: 1170952

This policy and guidance will be reviewed at least every 12 months or sooner if there are any changes in the related legislation or when an incident dictates. This will ensure that this document is current and fit for purpose.

This Policy should be read in conjunction with the following Bridging the Gap's policies: -

- Social Media Usage Policy
- Safeguarding Policy
- Data Protection Policy

Date reviewed: 25th January 2023

Reviewed by: Michelle McHale & Lynda Mason

Next review due: 25th January 2024

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## **1. Principle and Purpose:**

All organisations have to think about how they store and share information as part of safeguarding. However, additional pressures will be experienced by Bridging the Gap (BTG) as an infrastructure organisation, with a position in the local community, and a relationship with the local authorities it works within.

The aim of this policy is to set out clearly for staff, volunteers, service users and external agencies how personal information will be managed by BTG.

BTG aims to provide a confidential service. All BTG staff, whether paid or voluntary, are expected to treat with confidence any information obtained about anyone who uses the service. 'Treating with confidence' means not disclosing or revealing any information to individuals or other agencies without the express permission of the user.

**The principle of this policy** is to ensure that the safety of those in contact with BTG is maintained and that their rights are protected. BTG is committed to maintaining high standards of confidentiality in all aspects of its work. This includes records and information pertaining to, but not exclusive of, employees, volunteers, service users and prospective service users. Breaches of confidentiality may jeopardise the wellbeing of staff, volunteers and service users. Any breach of confidentiality may jeopardise the person's position within BTG.

**The purpose of this policy** is to give guidelines on maintaining confidentiality, the circumstances where disclosures may be necessary and the procedure for doing so.

## **2. Internal Confidentiality:**

Confidentiality exists between service users, volunteers and not with any particular member of staff. Information can therefore be shared with all staff on a need-to-know basis. This should be made clear to people who use our services.

Information may routinely be shared with workers from other agencies who act as referral agencies, unless someone specifically asks not to do so and there is good reason for this.

## **3. Case Files/Client Referral Vouchers:**

To protect the confidentiality of all service users and staff, whether paid or volunteers, it is advised that files/client referral vouchers only be kept in accordance

with current data protection legislation and for no more than two years unless there is a legitimate reason to hold the information for a longer period.

Any service user or employee can request to look at information BTG holds about them. All personal information is kept secure within a locked cabinet within a locked office. In addition, voucher information is stored on a secure database which requires two factor security login and is accessible only to authorised personnel. All IT equipment is password protected.

#### **4. Information Sharing:**

In order to best help people who use BTG's service it is often necessary to be able to share information with other professionals and organisations such as referral agents. This will be explained to clients and their informed consent will be sought where possible.

#### **5. Social Media:**

When using social media sites like Facebook and Twitter, confidentiality must be maintained to the highest level. Any photographs or videos taken of any individual must only be done so with the express permission of the subject. Service users' personal information must never be discussed on public social media sites.

#### **6. Exceptional Circumstances:**

There may be circumstances where it is not possible to maintain confidentiality. Any such situation must be referred to BGT's Safeguarding Officer and/or Board of Trustees.

The following may present as 'exceptional circumstances': -

- a) Where someone requires urgent medical treatment
- b) Where there is evidence to suggest that the person is at serious risk of harming themselves or others
- c) If there are safeguarding issues, for example:
  - If you think a person is at serious risk of significant harm or abuse, including harming themselves

- If you are required to by law, for example, if there is any suspicion of forced marriage or female genital mutilation
- If you think the person lacks the mental capacity to decide and have agreed with BTG's Safeguarding Officer that it would be in the individual's best interest.

The protection of any vulnerable person is higher than confidentiality. This is in line with the safeguarding policy.

d) In relation to someone who is involved in dealing drugs within BTG's service

e) Where a BTG worker is required to appear in Court

f) Where the information is about an act of terrorism

## **7. Procedure for Breaking Confidentiality:**

If a volunteer/staff member breaks confidentiality it must first be reported to the Project Manager or in their absence the Chair of Trustees who is the safeguarding lead.

Any break in confidentiality may jeopardise the volunteer/staff member's position. However, this does not cover situations where it is deemed necessary to break confidentiality due to safeguarding but evidence of the need to break confidentiality may be required.

## **8. Police and Local Authority Safeguarding Teams:**

When the Police or Local Authority Safeguarding Teams approach BTG for information, all enquiries should be passed on to the relevant Project Manager in the first instance or, in their absence, directly to Chair of Trustees and Lead for Safeguarding. BTG has a duty of care for each person using the service, including all volunteers, visitors and paid staff.

## **9. Personal information:**

Personal details relating to workers, volunteers or service users, including their home address, social media accounts, email information or telephone number must not be given out to anyone without their express permission.

An exception to this is if there is reasonable cause to suspect that a child or vulnerable adult is at risk of significant harm then the level of confidentiality will be overruled by the need to protect the vulnerable person. The protection of any

vulnerable person is higher than confidentiality. This is in line with BTG's Safeguarding Policy.

**10. Appointed Safeguarding Personnel:**

Deputy Safeguarding Officers: Project Managers

Trustee Safeguarding Lead: Michelle McHale BEM (Chair)