

Confidentiality Policy

This policy applies to Trustees, staff, members, apprentice or freelance workers and volunteers of Healthwatch Bristol, North Somerset & South Gloucestershire (BNSSG).

When working for Healthwatch BNSSG, Trustees, staff and volunteers will often need to have access to confidential information which may include, for example:

- Personal information about individuals who are persons or otherwise involved in the activities organised by Healthwatch
- Information about the internal business of Healthwatch
- Personal information about staff or volunteers or members working for Healthwatch
- Confidential information or business about the health and care system

Healthwatch is committed to keeping this information confidential, to protect people and our organisation. '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. You must assume that information is confidential unless you know that it is intended by Healthwatch to be made public.

You must also be particularly careful not to disclose confidential information to unauthorised people or cause a breach of security. You must:

- not compromise or seek to evade security measures (including computer passwords)
- be particularly careful when sending information to other agencies and organisations
- not share confidential information, either with colleagues or people outside Healthwatch
- not disclose information — especially over the telephone — unless you are sure that you know who you are disclosing it to, and they are authorised to have it.

If you are in doubt about whether to disclose information or not, do not guess. Withhold the information while you check with your line manager whether the disclosure is appropriate. Your confidentiality obligations continue to apply indefinitely after you have stopped working or volunteering for Healthwatch.

The data covered by the confidentiality policy includes:

- Information about Healthwatch BNSSG as an organisation
- Information about other organisations
- Personal information about individuals whether recorded electronically or in paper form

All Trustees, staff, volunteers, and others who work at Healthwatch Bristol, North Somerset and South Gloucestershire must respect the need for confidentiality of information held about anyone who encounters the organisation, and about any company business. This is expected to continue even when contact has ceased with this person, and when the Director, volunteer or staff member no longer works for Healthwatch.

This policy should be read in conjunction with the Healthwatch BNSSG Privacy Policy covering data protection and Healthwatch Bristol, North Somerset and South Gloucestershire's GDPR Privacy Statement. This can be made available to you by the Volunteer Co-ordinator.

Information about individuals

Healthwatch 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.

Confidential information will not be sought unless necessary for the delivery of the service or expressly in the interests of that person, i.e. to enable a better service delivery.

Personal information will only be passed to another agency or to other individuals outside of the organisation with the consent of the person, 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 person or to refer them to another agency, then this must be explained to the person and their permission given.

No personal information about staff, volunteers or people will be given to any third party including a member of their family, without the consent of the person. Information will only be divulged on a "need to know" basis.

Personal 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 people it may be necessary to share information with a manager or colleagues within Healthwatch.

All persons are entitled to privacy and will be made aware that they can specifically request to be seen in private.

Under no circumstances should someone's personal details be discussed with anyone outside the organisation or in an open-plan area in such a manner that it is possible to identify the person.

Staff and volunteers should take due care and attention when speaking to people, using the telephone, or overhearing a conversation or the personal details of another service-user.

Use of person information for publicity, reporting or training purposes

Healthwatch BNSSG gives information where appropriate about the impact of our work.

If one of our projects or engagements has an outcome which would provide useful material for publicity, reporting or training purposes, then wherever possible the permission of the person 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 person to be made will be changed.

Limits to confidentiality

In certain circumstances Healthwatch BNSSG reserves the right to breach confidentiality immediately. This will be explained whenever we collect data or materials from research subjects or members of the public. Wherever possible anyone implicated in the confidentiality breach will be informed in the first instance, however, we reserve the right to breach confidentiality. These circumstances include, but are not limited to:

- If a staff member has a safeguarding concern
- If a staff member believes a call to the police is needed if person could be a danger to themselves or others
- If a disclosure is required by law, via the criminal justice system
- If we believe a serious crime has been committed
- If the person lacks the mental capacity to decide. In such cases the staff member must discuss the issue with their line manager and only act in the person's best interests
- If a person gives information which indicates a possible terrorist threat

The decision about whether to breach confidentiality will be decided on a case-by-case basis and always in conjunction with a manager.

Access to data

This Policy operates on a "need to know" basis and apart from staff and volunteers in the office of Healthwatch BNSSG; no-one will have access to personal or organisational information unless it is relevant to the service or their work.

All persons 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.

If any party concerned has a sensory or physical impairment, efforts will be made to ensure that all aspects of this policy and all communications are understood.

Significant breaches of this policy will be handled under Healthwatch BNSSG's disciplinary procedures.

Evaluation and Monitoring

All staff and volunteers will be given a copy of the Policy when they join Healthwatch BNSSG and will sign it to show that they will abide by it. Healthwatch BNSSG will ensure that staff & volunteers are trained in the application of this Policy.

Review

This Policy will be reviewed on a two-yearly basis, by the Healthwatch Bristol, North Somerset and South Gloucestershire Board of Trustees.

Staff and volunteers; I have read, and understand this Policy and will adhere to its terms and conditions.

Signed by Healthwatch staff member or
volunteer.....

Print name.....

Date.....

Board of Trustees assurance:

Date Approved	Date reviewed by Board	Next review completed	Next review expected
8.10.19	01.10.20	12.12.2023	12.12.2026
notes			



Signed.....

.....Georgie Bigg

Chair of Healthwatch Board of Trustees