

REVELATION CHURCH

CONFIDENTIALITY POLICY

It is our legal duty to protect the right to privacy of confidential information for each child, family, staff member, volunteer, student, Trustee, Member of Association or anyone who is connected with our charity. This policy aims to give guidance and should be read in conjunction with the Revelation Church Data Protection Policy and Revelation Church Privacy Notice.

Observing confidentiality means not disclosing private or sensitive information to someone else who has no right to it. The information concerned may relate to individuals or to the charity.

The issue of confidentiality will be discussed with all new members of staff and volunteers. They will be expected to sign the 'Agreement of Confidentiality' which will be explained thoroughly by their Supervisor or line Manager.

In the course of its work, the charity acquires personal and private information on:

- **Individuals** – our users, children and families so that staff and volunteers can provide an appropriate personal service.
- **Employees and Volunteers** – so that the charity can fulfil the duties and obligations of an employer.
- **Trustees and Members of Association** – to satisfy legal requirements laid down by the Charity Commission and Companies House.

These groups have a right to confidentiality in their dealings with the charity, and breach of confidentiality may not only result in breaking the law, but a breakdown of trust, which would undermine good relationships.

DATA PROTECTION ACT

Revelation Church will ensure that it complies with all aspects of the Data Protection Act. Please refer to the Revelation Church Data Protection Policy for detailed information on how we will do this and how it applies to this policy.

GENERAL PRINCIPLES

Information received by Revelation Church, as part of the services it provides, will be considered to be information for Revelation Church to share with colleagues and use to deliver its aims and objectives, unless otherwise specified.

Employees should inform groups, organisations or individuals why they are requesting information and explain the purpose of storing and using this information. Colleagues should ask permission to keep and use this information.

Employees are able to share information with their Line Manager in order to discuss issues and seek advice. Employees will not disclose to anyone, other than their line manager, any information considered sensitive, personal, financial or private without the knowledge or consent of the individual, or an officer, in the case of an organisation.

Employees should avoid exchanging personal information or comments (gossip) about individuals with whom they have a professional relationship.

Employees should avoid talking about organisations or individuals in social settings.

There may be circumstance where colleagues would want to discuss difficult situations with each other to gain a wider perspective on how to approach a problem.

If employees receive information from individuals outside Revelation Church regarding the conduct of a colleague or group, then this should be dealt with sensitively. The appropriate colleague should follow the Revelation Church Complaint Procedure and advise them accordingly.

If employees / volunteers are dissatisfied with the conduct of a colleague, and have sensitive information that could be evidenced through investigation, they should discuss it with the appropriate line manager who will follow the Revelation Church Whistleblowing Policy procedure. Any allegation, which is found to be malicious, or ill-founded, will be dealt with by Revelation Church under the Disciplinary Procedure. Where there is a legal duty on Revelation Church to disclose information, the person that is affected will be informed that disclosure has or will be made.

CHARITY ISSUES AND INFORMATION SHARING

The charity holds other private information on how we conduct ourselves as a charity. These may include:

- Details of the charity finances and budgeting
- The charity's policies and procedures
- Records of Trustees' meetings
- Safeguarding Children
- Safeguarding Adults
- Partnerships with other organisations (Christians Against Poverty and Trussell Trust)
- Collaborative work with other professionals in providing services and training

Information is kept to enable Revelation Church employees to understand the needs of individuals or service users in order to deliver the most appropriate services. Information about users may also be kept for the purposes of monitoring our equal opportunities policy and also for reporting back to funders.

Within the charity, confidential information is shared only on a "need to know" basis, to enable staff, volunteers and Trustees to fulfil their responsibilities.

From time to time the need arises for information to be shared with other agencies. This will normally only be done with the knowledge and consent of the individuals concerned. Any information sharing should always be done on the basis that we can explain/justify/substantiate any facts or views with the service user, as well as any other agency. This does not mean that we and the service user will always agree on all issues.

DUTY TO DISCLOSE INFORMATION

Revelation Church has a legal duty to disclose some information including:

- Child abuse and safeguarding concerns with children or vulnerable adults will be reported to the Children's Services / Social Services Department
- Drug trafficking, money laundering, acts of terrorism or treason will be disclosed to the police.
- In addition colleagues believing an illegal act has taken place, or that a user is at risk of harming themselves or others, must report this to a Trustee who will report it to the appropriate authorities.

Please refer to our safeguarding, anti-corruption and anti-money laundering policies for further information on process and procedures.

DISCLOSURES

Revelation Church complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.

Revelation Church will request pre-employment Disclosure and Barring Service (DBS) checks for new employees and volunteers whose posts involve contact with vulnerable children or adults, as specified by the Disclosure Guidance.

Revelation Church will clearly state the need for, and level of, Disclosure on the recruitment information.

Disclosure information is always kept separately from an applicant's personnel file in secure storage with access limited to those who are entitled to see it as part of their duties. It is a criminal offence to pass this information to anyone who is not entitled to receive it.

Documents will be kept for a year and then destroyed by secure means. Photocopies will not be kept. However, Revelation Church may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, and the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

BREACH OF CONFIDENTIALITY

To breach confidentiality is serious and can result in disciplinary and sometimes legal action. If you are in doubt about whether or not something is confidential, and whether or not it can be disclosed, please ask your Supervisor or line Manager before doing so.

Employees who are dissatisfied with the conduct or actions of other colleagues or Revelation Church should raise this with their line manager using the grievance / complaints procedure, if necessary, and not discuss their dissatisfaction outside Revelation Church.

Employees accessing unauthorised files or breaching confidentially may face disciplinary action. Ex-employees breaching confidentiality may face legal action.

WHISTLEBLOWING

Any colleagues who have concerns about the use of Revelation Church funds, or any practice by any employee / Volunteer should speak to their line manager or a Trustee and refer to the Revelation Church Complaints and Whistleblowing policies.