

Confidentiality Policy

March 2024

Our Strategic Objectives relating to young people with high learning potential, their parents and carers, and their schools:

- *Empowering Young People*
- *Empowering Parents*
- *Creating a Community*
- *Advocating for Needs and Rights*
- *Strengthening our sustainability and effectiveness*

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1. Overview / Purpose

Potential Plus UK believes that it is essential to protect the confidentiality of information provided by its employees, casual workers, volunteers (including trustees), partnership agencies, service users and members and their families.

Adherence to this policy will ensure that employees, casual workers, volunteers (including trustees), partnership staff and service users are treated fairly and with respect and that breaches of confidentiality are avoided.

2. Scope

The confidential information within the scope of this policy applies to Potential Plus UK employees, casual workers, volunteers, trustees, partnership agencies, service users and members and their families.

The confidentiality obligations within the scope of this policy apply to all employees, casual workers, volunteers, trustees and partnership agencies, each of whom will have signed a contract or confidentiality agreement with Potential Plus UK which sets out their confidentiality commitments.

3. Definitions

Disclosure and Barring Service (DBS) – The DBS helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA).

4. Policy

4.1 Employees Records

All digital files are held securely in a password protected online environment with 2-factor authentication. Access to information concerning employees is on a *need-to-know* basis. This practice must be observed.

- All personnel files are held in the secure environment with accessibility designated by the role of the individual.
- Confidential personnel files are accessible by the CEO. If relevant information is required from these files by others, then a request must be made through the CEO, who will provide the relevant information as appropriate.
- Additional staff files relating to salary payments, bank details, contracts and schedules are held securely in digital files. Access to these files is normally only available to the CEO, Deputy CEO and the Senior Finance Officer.

- Criminal Record information about staff with un-spent convictions, and/or spent convictions where relevant are kept in confidential personnel files held by the CEO.
- Information from the Disclosure and Barring Service (DBS) is held digitally in a separate secure Team. They are accessible by the Safeguarding Team, which comprises the Senior Designated Safeguarding Lead, the Deputy Designated Safeguarding Leads, and the Trustee with responsibility for Safeguarding. Appraisal files are held by the CEO in a secure digital area. These files are available to the appropriate Line Managers and Chair of Board of Trustees on request and to aid the annual appraisal procedure.
- Personnel files will be kept for **3 years** following the departure of a member of staff and will then be shredded or digital copies deleted.
- Files on unsuccessful applicants for posts with Potential Plus UK will be kept in a locked cabinet or secure digital area for a maximum of six months and then shredded and/or digital copies deleted.
- Staff may have access to their own files at any reasonable time.

4.2 Confidentiality behaviour for Staff, Volunteers and Partnership Agencies

All employees, casual workers, volunteers and partnership agencies should demonstrate respect and courtesy for others in their general conversation. This expectation would preclude malicious gossip and overt criticism of others outside the line management structure. It does not preclude discussion of performance of staff in the appropriate setting or the use of the grievance procedure.

Employees, casual workers and volunteers (including Trustees) must not disclose any personal information about other employees, casual workers, volunteers, members or service users (including photographs) to any third party without written permission from the source. This includes referrals through the Advice and Service and the Assessment Service.

Written permission from the source must be obtained before using individual situations or case histories in publications, fundraising or other publicly accessible discussions on the issues relating to high learning potential. All statistics and information gathered for planning and monitoring purposes must be anonymised.

Failure to adhere to the policy may result in disciplinary proceedings.

4.3 Confidentiality at Staff and Volunteer Induction

The issue of confidentiality must be covered at the inductions of all employees, casual workers and relevant volunteers, including trustees.

Employees, casual workers, relevant volunteers (including those at branches) and trustees are required to sign a statement, agreeing to adhere to the confidentiality guidelines. A copy of this statement is appended.

Information received during the course of working or volunteering (e.g. about service users and colleagues) is confidential to employees, casual workers, volunteers and trustees on a need to know basis.

Care must be taken to avoid accidental breaches of confidentiality – for example, discussing a case within the hearing of other people, or storing notes made where they may be seen by unauthorised people. Information learned about Potential Plus UK employees, casual workers, volunteers, trustees or partnership staff is also confidential - just as information about you remains confidential.

4.4 Confidentiality on the Board of Management

The Board of Management is bound by the same code as volunteers. Trustees must maintain the confidentiality of matters discussed at the Board.

5. Monitoring and Reporting

Any confidentiality breaches must be reported to the Chief Executive and Board of Management. Confidentiality breaches must be recorded.

Signed confidentiality agreements will be kept for **3 years** following the departure of an employee, casual worker, volunteer, trustee or partnership agencies, and will then be shredded or digital copies deleted.

6. Training

All employees, casual workers, volunteers and trustees are required to read this policy and sign the associated confidentiality agreement as part of their induction.

7. Roles and Responsibilities

All employees, casual workers, volunteers and trustees have a responsibility to adhere to this policy and to ensure that others do so too.

8. Related Standards, Policies and Processes

- Potential Plus UK Code of Good Governance
- Potential Plus UK Records Retention & Data Protection Policy
- Potential Plus UK Privacy Policy
- Potential Plus UK Induction Procedure for employees, casual workers, volunteers and trustees

9. Revision History

Version:	Date Approved:	Approved by:	Owner:	Author:	Summary of Change:	Review Date:
20241229	29 Dec 2024	CEO	Board of Trustees	Steve Ramsden, CEO	Corrected charity # in footer	05/03/2027
20240305	5 March 2024	Board of Trustees	Board of Trustees	Steve Ramsden, Chair of Trustees	Reviewed and revised	05/03/2027
20210323	23 March 2021	Board of Trustees	Board of Trustees	Steve Ramsden, Chair of Trustees	Reviewed and revised	23/03/2024

Appendix 1 – Confidentiality Agreement

Potential Plus UK Policy: Confidentiality Agreement

I have read the confidentiality policy.

I understand that during the course of my time with Potential Plus UK I may have access to information of a confidential nature concerning members, service users, employees, casual workers and volunteers (including trustees), as well as staff from partnership agencies, and that I must maintain the confidentiality of such information both during my time with Potential Plus UK and afterwards.

I undertake not to divulge any such confidential information to anyone outside Potential Plus UK during my time with Potential Plus UK or in the future.

In the event of any such disclosure I understand that my time with Potential Plus UK may be terminated immediately.

Signed: _____

Name: _____ (Please print)

Date: _____