



Confidentiality Policy

April 2021

Purpose of this Statement	To detail the Confidentiality Policy at Bradford North Foodbank
Dated	25 th January 2022
Designated Contact	Foodbank Manager

This policy is just one in a suite of policies concerned with data protection. Other policies and procedures within the GDPR Suite:

- Data Protection Policy
- Privacy Policy and Privacy Statements
- Online Privacy Statement and Cookies Policy
- Records Management Policy
- Records Management Procedures

Confidentiality Principles

Bradford North Foodbank recognises that the legitimate use of information underpins our service.

Those who share sensitive personal information with Bradford North Foodbank have a right to expect that it will be treated as confidential.

As a member of the Trussell Trust Foodbank Network, Bradford North Foodbank has access to intellectual property belonging to the Trussell Trust as published in their Operating Manual and other documentation.

Personal and confidential information in any form obtained by Bradford North Foodbank will be handled in compliance with data protection law and only in the ways relevant to the purpose of providing support as set out in our privacy notice.

Access to the information we hold is limited to those who have a genuine need to see and use it in order to fulfil their roles in delivering our service.

Everyone who works for or with Bradford North Foodbank understands their duty to maintain the confidentiality and relevance of information that is shared with or by them and the consequences of breaching that confidentiality.

For trustees that means:

- fully committing to the principles of confidentiality and the management and security of information they receive in the course of their duties
- being responsible for ensuring that everyone in Bradford North Foodbank understands and is committed to maintaining confidentiality
- ensuring that dated and signed records are kept of all access to sensitive information along with the reasons for that access

- ensuring that procedures are in place that mean that the information collected is only what is needed to deliver the service, that it is kept securely in whichever form it takes and is only available to those who need to know
- ensuring that procedures are in place for sharing information securely and in line with our privacy statements
- being responsible for dealing with any breach of confidentiality including, if necessary, ending an individual's association with Bradford North Foodbank, reporting breaches to the relevant authority and cooperating with any investigation / prosecution.

For staff that means:

- following the principles set out in this policy and associated policies / privacy statements in all their work.
- maintaining the confidentiality and security of all their records
- ensuring that information they hold about others and information they provide about themselves is accurate, up to date and only what is needed to provide the service
- recognising that everyone involved with Bradford North Foodbank has a right to confidentiality
- following the systems and procedures to maintain confidentiality including when sharing with other agencies
- knowing that where there are concerns about the safety or wellbeing of a child or vulnerable adult, the families, or individual members within the family, need not be informed that their information is being passed on to the relevant authorities if telling them has the potential to cause further harm, or may jeopardise any investigation by Police, Social Care or other agencies with legal investigatory powers.
- knowing and following the procedures for dealing with a request for information from the police, courts or other agencies with legal powers to collect information
- being aware that breaches of confidentiality are serious matters and could result in being fired and even prosecution.

For volunteers that means:

- making sure they understand and follow the principles of confidentiality stated above, understand the limits around what personal information is collected and shared (set out in privacy statements), understand that the intellectual rights to Trussell Trust operational resources must be respected and follow the procedures put in place by Bradford North Foodbank to maintain confidentiality.
- being careful not to discuss clients they support in ways that would identify them to others making sure that any information they record about clients is held securely and is destroyed according to the records management procedures in place at the time.
- knowing that breaches of confidentiality are serious and could result in ending their volunteering role and even make them liable to prosecution.

For clients that means:

- knowing how and why Bradford North Foodbank will collect information from and about them and in what circumstances it could be shared (set out in the Client Privacy Statement).
- having confidence that Bradford North Foodbank will respect their right to confidentiality and will let them know wherever possible before sharing information about them.
- being aware that if Bradford North Foodbank believes that telling them that we will share their information might put them or a child at risk of harm, we will not tell them first.

- knowing that Bradford North Foodbank will keep accurate and up to date records and that there are clear limits to how long information is kept in an identifiable form.

Induction

Trustees, staff and volunteers

During induction everyone should be made aware of and asked to commit to the confidentiality principles and procedures by signing either our Employee or Volunteer Confidentiality Statement.

Clients

A poster will be displayed at each Foodbank Centre explaining how we will treat confidential personal data and directing them to where they can access a copy of the Client Data Privacy Statement.

Every foodbank voucher also has a data privacy statement included.

Sharing information

Trustees

Trustees may have access to confidential information. Where the board has to discuss confidential personnel matters or operationally sensitive items the minutes are taken separately from the normal minutes and their circulation restricted to only those who need to know. Generally, however, reports to the board about operational matters, services, needs, case studies etc, will be in an anonymised form.

Trustees are responsible for monitoring how Bradford North Foodbank staff and volunteers handle confidential information and for ensuring there are appropriately secure storage arrangements maintained.

Staff

When staff need to share information with other agencies, they will ensure such agencies have a legitimate interest in knowing the information and that they have appropriate confidentiality, data protection and privacy notices in place which conform with the law and Bradford North Foodbank practice.

When discussing clients with other staff or volunteers, confidentiality should be maintained at all times in line with this and other policies within our GDPR suite of policies. Such discussions should take place in a confidential setting.

When formal requests from courts or police for information are made the trustees should be informed and the material supplied in the form of a witness statement drawn up from actual dated and signed records.

Volunteers

When meeting for peer support or training, volunteers should not discuss their current or former clients in a way which would identify them to others and breach that client's right to confidentiality.

Other agencies and external contractors

Confidential information may be shared with relevant agencies who have a legitimate interest in supporting clients, unless to do so would put anyone at risk.

Statistical information and case studies are anonymised.

Any third-party contractor accessing personal, sensitive information incidental to their work will sign an undertaking ensuring strict confidentiality will be maintained and be under contract to protect the confidentiality and security of the information.

Safeguarding

There are times when trustees, staff and volunteers may need to break confidentiality. If there are concerns about the safety or wellbeing of a child, or a vulnerable adult, data protection law allows the sharing of relevant personal information. In fact, there is a legal and moral obligation to report safety or wellbeing concerns to the relevant authorities.

Information shared in these circumstances must be shared in a secure manner and only the minimum personal information necessary for the purpose must be shared. The parties involved should not be informed that information about them has been shared if doing so would jeopardise an investigation by police, social care or other agency with investigatory powers.

Record Keeping

All trustee, staff, volunteer, client and financial records are kept securely. Access is restricted to those who have a need to know or a particular role to fulfil (including QA and external auditors) and monitored through a record of access form which is signed and dated by anyone accessing the files.

Information in files is the minimum necessary to provide effective support.

Publicly accessible displays and notice boards should not contain identifiable information about clients.

Statistical information about clients and the service is anonymised when shared.

Trustees, staff and volunteers are made aware of their rights under data protection law to access what information Bradford North Foodbank holds about them.

This policy should be read alongside all the other policies in the GDPR Suite (listed on page 1 of this policy)

Named Confidentiality Trustee	Moira Crotty
Monitoring of Procedure	Foodbank Manager
Reporting To	Trustees
Next Review Date	January 2023

This policy was reviewed, minor edits made and adopted by the trustees on 25/01/2022

Appendix 1: Breach Flowchart

- A decision will be taken by the Trustee Lead on whether to report a breach.
- If a breach may result in adversely affecting individuals' rights, you must also inform those individuals without undue delay.
- You must keep a record of any personal data breaches regardless of whether you are required to notify.
- Failing to notify a breach can result in a significant fine.

1	2	3	4	5
Breach reported & recorded on register (note date – 72 hours begins here)	Notify Trustee lead / Chair as soon as possible.	Notify persons affected (without undue delay).	Notify The Trussell Trust (as soon as possible for serious breaches).	Report and update to Trustees including action plan.
	Notify the ICO on 0303 123 1113 within 72 hours.			
	Investigate breach – response guidance and checklists at ICO.			
	Take protective action (eg. disable logins of affected services, change locks)			

Appendix 2: Volunteer Confidentiality Statement

As a volunteer for Bradford North foodbank, you may have access to (or may learn of) information of a confidential nature including personal volunteer, donor and/or client details.

When someone gives us any confidential information, they need to be sure that we will not pass this on to anyone else without their prior permission.

The only exception to this is information that raises a concern (for instance theft or safeguarding). In this case, you will be expected to share this with the appropriate person in the foodbank (for instance, your line manager or safeguarding officer). (Volunteers are not expected to take information to the police or social services themselves.)

Confidential information includes (but is not limited to) foodbank vouchers, data collection system entries, spoken words and presentations, printed documents, loose notes, diaries, memoranda, drawings, photographs, electronic, magnetic and optical storage, and computer printouts. **All the content of the foodbank operating manual is also confidential.**

Confidentiality Statement

I understand that while volunteering with Bradford North foodbank I may come across information that is confidential. I agree that I will never disclose such confidential information to anyone outside of the project, subject to the exception outlined above. I agree to delete or return any information held on my personal computer or IT equipment when I cease volunteering with Bradford North foodbank.

I also agree to respect the intellectual property of The Trussell Trust and not to pass on any foodbank forms or documentation or other contents of the manual I may use in the course of volunteering for Bradford North foodbank to anyone outside of the project.

I understand breaches of this agreement could result in termination of volunteering with the foodbank.

Signed Date

Name.....

Witnessed by...

Signed: Name: Date: __ / __ / ____

Position

Appendix 3: Employee Confidentiality Statement

As an employee of Bradford North foodbank, you will have access to (or may learn of) information of a confidential nature including personal staff (employees & volunteers), donor and/or client details.

When someone gives us any confidential information, they need to be sure that we will not pass this on to anyone else without their prior permission.

The only exception to this is information that raises a concern (for instance theft or safeguarding). In this case, you will be expected to share this with the appropriate person in the foodbank (for instance, your line manager or safeguarding officer). (Employees and volunteers are not expected to take information to the police or social services themselves.)

Confidential information includes (but is not limited to):

- foodbank vouchers, data collection system entries, spoken words and presentations, printed documents, loose notes, diaries, memoranda, drawings, photographs, electronic, magnetic and optical storage, and computer printouts.
- **All the content of foodbank operating manuals is also confidential.**

Confidentiality Statement

I understand that while employed by Bradford North foodbank I may come across information that is confidential. I agree that I will never disclose such confidential information to anyone outside of the project, subject to the exception outlined above. I agree to delete or return any information held on my personal computer or IT equipment when I cease employment with Bradford North Foodbank.

I also agree to respect the intellectual property of The Trussell Trust and not to pass on any foodbank forms or documentation or other contents of the manual I may use in the course of my employment with Bradford North foodbank to anyone outside of the project.

I understand breaches of this agreement could result in termination of my employment with the Bradford North Foodbank.

Signed Date

Name.....

Witnessed by...

Signed: Name: Date: __/__/__

Position