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## **Confidentiality Policy**

Green Routes recognises the importance of confidentiality in dealing with personal information regarding staff, volunteers, students and children ie under 16 years and their families. They will observe confidentiality and ensure information is accessed by only those who need to know.

Green Routes is committed to meeting the principles of the General Data Protection Regulations ( GDPR ) of 25<sup>th</sup> May 2018 which indicate that information must be:

- Fairly & lawfully processed
- Processed for limited purpose.
- Adequate, relevant and not excessive
- Accurate and up-to-date
- Not kept longer than is necessary
- Processed in line with your rights
- Held securely and not transferred to other countries without adequate protection.

### **Obligations of Green Routes**

It is the obligation of Green Routes to process and hold personal & sensitive information required to lawfully carry out our business.

In practice this means:

- Consent from staff, volunteers, sessional staff, students and families holding parental responsibility for children to :-
  - Retain personal information and share it with relevant colleagues and agencies when appropriate.
  - To have their photo used by Green Routes for publicity, including on their web site, Facebook and for promotional material.

Personal information and photography consent will be included in the application for staff, sessional staff, volunteers and students and will be reviewed annually.

Doc Ref : GDPR Confidentiality Policy Version 12 Date : 25<sup>th</sup> November 2021



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Ensuring :-

- Easy access to information & individuals understand how to access their information
- Individuals are aware that they can request information to be deleted or access to information restricted.
- On-going consent is monitored. Refer to document Information Audit Form.
- Annual reviews of controls & information.
- Information electronically stored :-
  - held in password-protected files,
  - accessed only by those on needs to know basis
  - secured with anti-virus system.
  - backed up off site
- Paper based information kept in locked cabinet.

### **Access to information**

Any person about whom information is held has a right of access to that information subject to:

- Where there is an obligation to report a suspected crime
- Where there is a serious risk of violence or abuse
- Where required by law or court order
- When urgent medical attention is needed

This right extends to the parents of children. If access is sought, it should be arranged in conjunction with the manager who will clarify any queries and ensure that information is returned.

If information is disclosed without consent, a written record should be made recording all relevant details including whether the subject of the disclosure was informed before or after the event and if so when and how.

Green Routes aims to be as open as possible and access to records should not be refused without consultation with the manager.

Access to information may be refused where it would cause serious harm to the mental or physical condition of the person concerned or when there are reasons relating to the investigation of crime.

Where access is refused Green Routes must explain the reason to the individual, informing them of their right to complain to supervisory authority and provide the remedy without due delay and at least within one month.

If staff of other agencies disclose information regarding young people or their families to Green Routes they should be informed that Green Routes has a needs to know policy and that unless it is clearly stipulated, the information will be held on this basis.

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**Close Circuit Television ( CCTV )**

This is covered by the Act and Green Routes has notices displayed informing of CCTV in place.

**Data retention and disposal**

Any confidential information on personnel should be retained in accordance with the General Data Protection Regulation.

All paper information both sensitive and personal when not required will be destroyed by shredding.

Information will be erased or restricted if requested *by the individual giving the consent*

No sensitive information is e mailed to Green Routes.

Signed & date of adoption by Board of Trustees : 18/02/2011

Signed & date of review : 25/11/2021