

## CONFIDENTIALITY POLICY

### Statement of Purpose

To ensure that all Sentinel's customers and employees are aware of Sentinel's commitment to high standards in the treatment of all personal, commercial and confidential information.

### Our Policy

#### Definitions

1. Generally, Sentinel holds two types of confidential information:
  - i. Personal information on employees and customers
  - ii. Business information of commercial value

#### Obtaining Information

2. We will seek consent, where appropriate, from all individuals when obtaining, collecting, or collating personal and sensitive data, in compliance with statutory legislation and fairness.

#### Maintaining, Storing and Disposing of Information

3. We will do our best to ensure that the data held is accurate and up to date, and invite individuals to inform us of changes in circumstances, where necessary.
4. We will only hold information that is relevant for the purpose for which it is required, and hold only as long as is necessary to perform our business functions, or as legislation demands.
5. The length of time we hold documents is set out in the 'Classification and Retention Schedule'. A copy is available on request from the [Policy Officer](#).
6. We will securely store all confidential, personal, and commercially sensitive information in a manner that is accessible only to those who require it for valid business reasons.
7. We will dispose of all confidential information in a secure manner that safeguards the information from being utilised further.

#### Disclosure

8. Confidential information will only be passed to other parties on a need to know basis, with the individuals consent; unless there are exceptional circumstances. Exceptional circumstances may include:
  - there is clear evidence of fraud;
  - in compliance with the law;
  - In connection with legal proceedings;
  - where not to do may endanger the health and safety of others
  - Anonymously for statistical or research information.
  - Specified information sharing agreements we have with other agencies or bodies

9. Organisational information, names and addresses of customers will not be disclosed to board members, unless specifically required to perform the proper duties of the Association.

#### Persons acting on behalf of the Association

10. Consultants and contractors undertaking work on behalf of the association will be required to adhere to this policy.
11. Prior approval from the Chief Executive or Chair of Sentinel's Board, must be obtained, in writing, before details are published about any development, proposed development, about our customers, staff, committees or the Association in general.

#### Access to information

12. Customers and Employees have the right to see information held about them, upon request. Sentinel reserves the right to charge £10 for this request.
13. Information demanded from an individual or organisation relating to a customer will only be disclosed upon written consent from the affected person, or where legal documentation demands its disclosure.
14. The association will not allow customers, or others, access to confidential letters from third parties such as doctors or social workers.

#### Confidential Business Information

15. In no circumstances should any confidential information, provided to Board members, be used or conveyed to the press, media or others, without the express agreement of the Chair of the Board, Chief Executive and the related organisation.
16. Employees must never disclose any confidential information without the express authority from the Chief Executive. Any breach of this requirement may be treated as gross misconduct leading to summary dismissal.

#### **Approval Stages**

Named Departmental Sign off: Damien Ward

Named Director Sign off: Martin Nurse

Implementation Date: 1<sup>st</sup> October 2008

## CONFIDENTIALITY POLICY SUMMARY

### **Regulation & Legislation**

This policy is linked to the following regulation and legislation: Data Protection Act 1998

### **Equality & Diversity Impact**

The association is committed to meeting the needs and aspirations of customers and communities in a fair, respectful, and proportionate manner. Our approach to diversity and equality is to promote inclusiveness by recognising that anyone, regardless of origin or background, can make a positive difference in the achievement of the organisation's vision and in the wider society.

We will comply with best practice from legal, regulatory and inspection requirements. Codes of Practice and other guidance will be used appropriately to ensure progress on diversity.

### **Financial Impact Assessment**

Potential significant financial impact on the organisation in the instance that confidential business information is leaked. Strict confidentiality protocols also reduce the risk of legal action

### **Risk Assessment**

Effective handling of confidential information is crucial to the business operations of Sentinel and also to the safety of our customers. As such, the delivery of this policy is crucial.

### **Monitoring and Review**

The operation of this policy will be regularly reviewed by the Head of Neighbourhood Services, IT Manager, HR Manager and Company Secretary, in conjunction with the Policy & Strategic Initiatives Officer, with adequate consultation of staff and customers. The outcome of that review will be communicated to the appropriate committee of the board.

### **Consultation**

Consultative Group: 7<sup>th</sup> April 2008

Staff Reps: 23<sup>rd</sup> September 2008

Tracey Cole, Basingstoke and Deane Borough Council: 19<sup>th</sup> September 2008

Sandra Kenning, Basingstoke and Deane Borough Council: 19<sup>th</sup> September 2008

Qamer Yasin, Rushmoor Borough Council: 19<sup>th</sup> September 2008

Heathlands Court Hen House: 3<sup>rd</sup> September 2008

Nicola Harpham, Hart Borough Council: 19<sup>th</sup> September 2008

Jo Crewdson, Hart Borough Council: 19<sup>th</sup> September 2008