



POLICY: / PROCEDURE:

Confidentiality Policy

FAO: Staff / Volunteers / Participants / Visitors

STATEMENT OF GENERAL PRINCIPLES

Sirona Therapeutic Horsemanship recognises that the right to privacy is essential to ensure that service users are able to have trust and confidence in these organisations. Sirona Therapeutic Horsemanship will make every effort to ensure and maintain a working environment where personal rights, choices and dignity are respected.

Sirona Therapeutic Horsemanship is therefore committed to the principle that any service user has the right to expect that any information provided by them be used solely for the purpose for which it was given. Information will not be divulged to any other person or organisation outside Sirona Therapeutic Horsemanship without their consent other than in those circumstances identified in this policy when this principle cannot be adhered to.

For the purpose of this policy the term 'service user' refers to anyone; whether an individual or organisation that uses any service provided by Sirona Therapeutic Horsemanship either directly or indirectly.

Sirona Therapeutic Horsemanship also recognises its duty of confidentiality to all its Trustees, Employees and Volunteers.

The principle of confidentiality also extends to all relevant information regarding the internal affairs of Sirona Therapeutic Horsemanship; especially any information relating to or involving any aspect of the charity. This duty of confidentiality applies to Trustees, Employees and Volunteers.

Duty of Confidentiality to Sirona Therapeutic Horsemanship

Sirona Therapeutic Horsemanship believes that its Trustees, Employees and Volunteers have a duty of confidentiality to the organisation. Employees are bound by their contract of employment and all Employees, Trustees and Volunteers are expected to act honestly and in good faith in all their dealings with the organisation.

All work undertaken by employees during their employment with Sirona Therapeutic Horsemanship remains the property of the organisation.

Employees are not allowed to make copies of reports, policies, databases, mailing lists or other documents which are the property of the organisation unless as a direct requirement of their duties and with the specific authorisation of their line manager.

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Whilst in the employment of the organisation employees are prohibited from using information provided by the organisation to set themselves up in competition.

Employees are not allowed to discuss the internal business of the organisation, including development plans and funding applications with outside organisations or individuals.

Duty of Confidentiality to Service Users

Sirona Therapeutic Horsemanship is committed to the principle that all information it collects on potential or actual service users is collected with the full knowledge and consent of the individual.

Sirona Therapeutic Horsemanship will ensure that all information held on a service user is:

- ✓ Accurate and kept up to date
- ✓ Relevant to and sufficient for only the purpose for which it has been collected
- ✓ Held for no longer than that purpose requires and that it is subsequently destroyed

The collection and recording of information

In all its contacts with potential or actual service users, whether in person, by telephone or in writing Sirona Therapeutic Horsemanship will ensure that:

- ✓ The individual is informed of the fact that information is being recorded and the purpose for which it will be used
- ✓ That in possession of that knowledge the individual gives consent to the information being recorded
- ✓ That specific consent is obtained before any information is recorded relating to:
 - Racial or ethnic origin
 - Religious or similar beliefs
 - Physical or mental condition
 - Sexual life
 - Political opinions
 - Any alleged or actual criminal offence or conviction

Confidentiality between participants

We also have a duty to maintain confidentiality of our participants at Sirona between each other. It is recognised that some participants will know each other from school/other places and may ask about other participants who attend Sirona. We need to ensure that we maintain all participants privacy but at the same time not shame the young person asking the information. The response can be along the following lines;

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'We have lots of participants coming here for different reasons and it is important that we respect everyone's privacy, so we don't share your name with anyone one else and vice versa we don't share anyone else's names. You are of course free personally to discuss your time at Sirona with anyone you wish to'.

Mailing Lists

Sirona Therapeutic Horsemanship holds contact lists for membership records, newsletters, and information on training and other services e.g. Open Day Events. The list is held to enable a steady flow of information to service users including professionals.

All service users are given the opportunity to choose whether or not they wish to be on Sirona Therapeutic Horsemanship's mailing list.

Information provided by a third party

Before any information is recorded relating to a potential or actual service user that has been provided by a third party, whether in person, by telephone or in writing Sirona Therapeutic Horsemanship will take every reasonable step to ensure that the individual has given consent to the disclosure of that information.

Information regarding an individual provided by a third party that is being provided without the knowledge or consent of the individual, will not knowingly be recorded by Sirona Therapeutic Horsemanship.

Sirona Therapeutic Horsemanship will ensure that as soon, as is practicable the individual concerned is informed of the nature of the information that has been provided and that they consent to this information being recorded.

Monitoring & Security (both storage and usage) of information.

Sirona Therapeutic Horsemanship will take every reasonable step to ensure that information held on a service user is maintained in a manner that preserves confidentiality and is only accessible or disclosed to the identified appropriate staff.

Access control is essential for ensuring that only authorised persons have:

- Access to the fileserver
- Access to manual files containing confidential information about individuals
- Access to databases and computer files containing confidential information about individuals.

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Access to the fileserver

The relevant staff member/s only should access the file server. The relevant staff member/s is responsible for backing up all information held on the file server-this includes a regular weekly backup of the database.

Access to manual files containing confidential information about individuals

Access to personal information about a service user is restricted to those members of staff who have a justifiable 'need to know' in order to carry out their jobs effectively.

Staff who need access to manual files for filing purposes should not need to access the information held within the files.

The management of all manual files is to be the responsibility of each head of department. All manually held information is to be kept in a locked and secure location. Information is to be accurately recorded and kept up to date.

Access to databases and computer files containing confidential information about individuals

The relevant staff member/s is responsible for ensuring that the database is managed efficiently. This includes the processing and checking of all data. The relevant staff member/s must ensure that all information stored is accurate and data will be reviewed annually.

The database is protected by means of a separate password to ensure that only authorised personnel have access to the information.

Access to records by service users

Service users will have access to any records that Sirona Therapeutic Horsemanship has recorded about them.

The data controller will follow Sirona's Subject Access Request procedure - SP011. Access to records will be given within thirty days of a written request. Sirona Therapeutic Horsemanship will normally provide this information free of charge but reserves the right to charge a 'reasonable fee' where an individual makes repeated requests. Sirona Therapeutic Horsemanship will maintain a register of all requests from service users to access information.

Disclosure of information to a third party.

Sirona Therapeutic Horsemanship will take every reasonable step to ensure that no information regarding a service user is disclosed without their prior consent except in circumstances where these organisations have a specific legal or contractual obligation

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to do so. Any disclosure of information to a third party will be recorded in the service users file together with confirmation that their consent had been received.

Breaches of confidentiality

Unauthorised disclosure of information by members of staff or by those working under contract to Sirona Therapeutic Horsemanship is a serious matter. Disciplinary action will be taken. All staff must be aware of the possible severe consequences of breaching service user confidentiality.

Anonymised information should be used wherever possible in preference to identifiable information, but disclosure should still only be for justifiable purposes.

Information should only be passed to relatives, friends and carers with the written permission of the service user.

Destruction of records

Sirona Therapeutic Horsemanship will ensure that all information held on a service user is kept only for as long as may be necessary, either to provide the appropriate level of service or to comply with other legal or contractual obligations. Service users will be made aware of their right to have all or part of the information held on them destroyed provided that this does not conflict with the organisations' legal or contractual obligations.

Authorised disclosure or holding of confidential information

In certain circumstances Sirona Therapeutic Horsemanship may disclose or hold information regarding a service user without their knowledge or consent. Such disclosure will only take place in clearly specified circumstances and will normally relate to the following situations:

- Behaviour which endangers the individual or others
- Criminal activity
- Suspected or actual abuse of the individual

Sirona Therapeutic Horsemanship will normally ensure that every reasonable step has been taken to obtain the consent of the service user and any disclosure may only take place with the agreement of the CEO / Safeguarding Officer or their deputy.

The duty of confidentiality to Employees and Volunteers

Sirona Therapeutic Horsemanship recognises its duty of confidentiality to all its employees and volunteers both passed and present. Sirona Therapeutic Horsemanship will therefore ensure that all personal information, whether held on computer; paper

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records or known to an employee of Sirona Therapeutic Horsemanship will be maintained in a confidential manner.

Recruitment of employees and volunteers

Through their recruitment procedures Sirona Therapeutic Horsemanship will ensure that all information requested from applicants is:

- Relevant and adequate for the purpose for which it is required
- Only disclosed or accessible to appropriate identified staff

All applicants will be informed of the purpose for which the information will be used and that should their application be unsuccessful that this information will be destroyed after six months from the date at which an appointment was made.

Staff & Volunteer Personnel Files

As employers Sirona Therapeutic Horsemanship are required to maintain personnel files for all its employees.

Sirona Therapeutic Horsemanship will ensure that all information held on employees and volunteers will be:

- ✓ Accurate and kept up to date
- ✓ Adequate, relevant to and sufficient for only the purpose for which it has been collected
- ✓ Held for no longer than that purpose requires and that it is subsequently destroyed
- ✓ Accessible to or disclosed only to identified authorised staff

Manual personnel files are kept on each employee and volunteer. Information is further stored on computer or Google Drive. Manual files are kept in a securely locked filing cabinet and only the relevant staff member/s hold keys. The computer records are secured by means of a password known only to the relevant staff member/s. Access to information held on Sirona Therapeutic Horsemanship staff and volunteers is restricted to the relevant staff member/s.

Obtaining information from a third party

Sirona Therapeutic Horsemanship may in certain circumstances seek information regarding an employee from a third party.

When seeking references for applicants Sirona Therapeutic Horsemanship will ensure that they request only information that is relevant to the applicant's ability to perform the proposed post.

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Any other information that may from time to time be required will always comply with current legal requirements.

References

In responding to requests from potential employers for references Sirona Therapeutic Horsemanship will ensure that the information provided complies with the principles identified in maintaining its personnel records.

References will only be provided in response to a specific request and will not supply individual employees with a general reference.

Disclosure of information to a third party

In general, any personal information given or received in confidence for one purpose may not be used for a different purpose or passed to anyone else.

However, information may be passed to someone else:

- ✓ With the staff members permission for a particular purpose
- ✓ It is a statutory requirement or is a response to a court order
- ✓ The public interest in passing on the information outweighs the duty of confidence to the staff member.

Breaches of confidentiality

Unauthorised disclosure of information whether relating to computer or paper records, or a result of oral disclosure by members of staff or by those working under contract to Sirona Therapeutic Horsemanship is a serious matter. Disciplinary action will be taken. All staff must be aware of the possible severe consequences of breaching confidentiality.

Requests to access personal information

All employees and volunteers give permission for the storage of personal information and may request access to their files. However, employees do not have any right of access to confidential employment references given.

Sirona Therapeutic Horsemanship will normally provide this information free of charge but reserves the right to charge a 'reasonable fee' where an individual makes repeated requests.

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Destruction of personnel records

Sirona Therapeutic Horsemanship will not maintain all or part of the information on any employee longer than it is required for the purpose for which it was obtained. The actual length of time will normally reflect the legal requirements placed on Sirona Therapeutic Horsemanship as employers.

Training Evaluation and Monitoring

All staff and volunteers will read this policy when they join Sirona Therapeutic Horsemanship as part of their induction and will sign the confidentiality statement that they will abide by this policy. Sirona Therapeutic Horsemanship will ensure that all staff and volunteers are trained in the application of this policy.

The policy will be reviewed every 2 years by Sirona Therapeutic Horsemanship directors/manager. It will also be reviewed in response to changes in relevant legislation, contractual arrangements, good practice or in response to an identified failing in its effectiveness.

Date this policy was approved by the Board of directors: 30/1/2012

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