

Leeds University Union

Confidentiality Policy

Policy Produced by Volunteering and Community

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Leeds University Union

Confidentiality Policy

1. Confidentiality Statement

- 1.1 Leeds University Union is committed to principles of confidentiality across all our activities and services involving student members, staff, volunteers and third-parties that we work with.
- 1.2 We respect all individuals we come into contact with and want to maintain their dignity. Therefore, we will not disclose information about them without their explicit consent or if we are obliged to by law.
- 1.3 Confidentiality should not put any individual at risk.
- 1.4 Not all information that is confidential is clearly marked as confidential. Therefore, it is important that employees, volunteers and students follow this guidance when dealing with information that is expected to be confidential.
- 1.5 All staff and volunteers will be informed of the importance of confidentiality at their inductions.

2. Definition of Confidentiality

- 2.1 Leeds University Union understands confidentiality as refraining from directly or indirectly disclosing information relating to individuals unless on a 'need to know' basis. This means not passing on information to third parties or to members of staff whose duties do not require the information, without the expressed consent of the individual to whom the information belongs. Confidentiality is not about having or keeping secrets but a method of working, enabling people to disclose information in the knowledge that it will not be passed on.

3. Why information is held

- 3.1 Employees, volunteers and students may use information about individuals and organisations that they have a relationship with during the course of their activities, work duties and services.
- 3.2 We keep information to enable us to record statistics about the scope and success of our services and projects and to maintain relationships.
- 3.3 CRB information: Students that want to volunteer with children or vulnerable adults will be added to a database where we will track their progress through our screening procedures. We will also handle their CRB application forms which contain confidential information. Please see the 'Policy and

procedures for the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure information' for more information.

4. How information is held

- 4.1 Leeds University Union keeps databases on volunteers, on students involved in Student activities (including membership) and information on students that use our membership services.
- 4.2 We use information to create general statistics on our impact and to evaluate our services.
- 4.3 Statistics collected for internal or external use are recorded anonymously.
- 4.4 Confidential information about student members is never passed on to external organisations.
- 4.5 Leeds University Union may pass on information about external organisations to other students when consent has been given by the organisation.
- 4.6 All records will be kept in line with the Data Protection Act 1998. It will be stored in secure, lockable filing cabinets or in confidential electronic files for 5 years. After 5 years paper documents will be shredded and electronic files will be deleted. Personal information sent electronically will be password-only accessible by the person for whom the information was intended.

5. Expressed Consent to Share Information

- 5.1 We will share with individuals about whom we hold traceable data and information the intended use of the information and will seek written/verbal consent to hold the information.
- 5.2 Where there is a safeguarding issue, a criminal issue or the safety of an individual is at risk, we will override expressed permission to share information. See point 6, 'Breach of Confidentiality' for process to be followed.

6. Breaching Confidentiality

- 6.1 Leeds University Union acknowledges that at times it may be appropriate to breach confidentiality. Any breach of confidentiality not in line with the policy will be treated seriously and may lead to disciplinary procedures.
- 6.2 Legally, we are obliged to disclose information on safeguarding issues which we will disclose to Leeds Social Care (in line with our safeguarding policy) and criminal activity which we will disclose to the police.
- 6.3 On occasions other than the above when a staff member or volunteer feels it is appropriate to disclose confidential information, they must bring the matter to the attention of a member of the Senior Leadership Team who will ultimately decide on the course of action and report on the case to the board of trustees.

7. CRB disclosures and disclosure information

As an organisation using the Criminal Records Bureau (CRB) Disclosure service to help assess the suitability of applicants for positions of trust, Leeds University Union complies fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available for those who wish to see it on request.

7.1 Storage and Access

Disclosure information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties. Electronic files will be stored in electronic folders that are only accessible (based on login accounts) to those that are entitled to see it as part of their duties.

7.2 Handling

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and it is an offence to pass this information to anyone who is not entitled to receive it.

7.3 Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

7.4 Retention

Once a recruitment or volunteering placement decision has been made, we do not keep the disclosure information for any longer than is necessary. This is generally for a period of up to 6 months, to allow to the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, we will consult with the CRB about this and give full consideration to the data protection act and human rights of the individual before doing so. Throughout this time the usual considerations regarding safe storage and strictly controlled access will prevail.

7.5 Disposal

Once the retention period has elapsed, we will ensure that Disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any

photocopy or other image or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

7.6 Acting as an Umbrella Body

Before acting as an Umbrella Body (one which countersigns applications and receives Disclosure information on behalf of other employers or recruiting organisations), we will take all reasonable steps to satisfy ourselves that the organisations for whom we act as an Umbrella body will handle, use, store, retain and dispose of Disclosure information in full compliance with the CRB Code and in full accordance with this policy. We will also ensure that anybody or individual, at whose request applications for Disclosure are countersigned, has such a written policy and, if necessary, we will provide a model policy for that individual to use or adapt for this purpose.