

Review Date- 10/02/2026

Trinity Support Services Confidentiality Policy

Purpose

This Confidentiality Policy aims to ensure that all personal and sensitive information handled by Trinity Support Services, including the Edge of Care Service and Return Home Interview Service, is managed with the highest degree of confidentiality, in compliance with legal requirements and best practice standards.

This policy ensures that Trinity Support Services maintains the trust and confidence of those we support by protecting their information with the utmost care and integrity.

Scope

This policy applies to all employees, volunteers, contractors, and any other individuals or entities engaged in activities with Trinity Support Services. It covers all forms of information, including but not limited to written, electronic, verbal, and visual data.

Principles

1. **Legal Compliance:** Adhere to relevant laws and regulations, including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
2. **Respect for Privacy:** Recognise and respect the privacy of individuals by protecting their personal information.
3. **Need-to-Know Basis:** Access to confidential information will be restricted to individuals who need the information to perform their duties.

Definitions

- **Confidential Information:** Any information that is not public and relates to clients, employees, volunteers, or the organisation, including personal data, health records, financial information, and case details.
- **Personal Data:** Any information relating to an identified or identifiable individual.

Responsibilities

- **Employees and Volunteers:** Ensure confidentiality in handling information, participate in training, and report breaches.
- **Management:** Implement this policy, provide training, and monitor compliance.
- **Data Protection Officer (DPO):** Oversee data protection strategy and implementation to ensure compliance with GDPR requirements.

Information Handling

- **Collection:** Collect only the necessary information for providing services.
- **Storage:** Store information securely using appropriate physical and electronic measures.

- Access: Limit access to information based on the need-to-know principle.
- Sharing: Share information internally and externally only with appropriate consent or when legally required.
- Retention and Disposal: Retain information only as long as necessary and dispose of it securely.

Use of WhatsApp

- WhatsApp may only be used for team handover notes within Trinity Support Services.
- Confidential information, including personal data, case details, and photographs, must not be shared via WhatsApp.
- Employees must ensure that any information shared in WhatsApp groups adheres to this policy and does not breach confidentiality requirements.
- Any misuse of WhatsApp for sharing confidential data will be considered a breach of this policy and subject to disciplinary action.

Employees must not:

- Use confidential information for any personal benefit
- Disclose confidential information to anyone outside of our Trinity Support Services
- Replicate confidential documents and files and store them on insecure devices
- Send electronically from any email address that is not an official Trinity Support Services email address

Any employee who ends employment with Trinity Support Services will be obliged to return all devices that have been used during the course of their employment.

Confidential information may occasionally be required to be disclosed for legitimate reasons. In such cases, employees involved are required to document their disclosure procedure and collect all needed authorisations. We're bound to avoid disclosing more information than needed.

Consent

- Obtain explicit consent from individuals before collecting, using, or sharing their personal information, unless there is a legal obligation to do so.
- Provide individuals with clear information about how their data will be used.

Breach of Confidentiality

- Reporting: Report any suspected or actual breaches of confidentiality immediately to the DPO.
- Investigation: Investigate breaches promptly and take appropriate corrective actions.
- Disciplinary Action: Implement disciplinary measures for violations of this policy.

Confidentiality in Specific Services

1. Edge of Care Service:
 - Handle sensitive family and child information with utmost care.
 - Ensure all discussions and records are kept confidential and only shared with authorised personnel.

2. Return Home Interview Service:
 - Protect the identities and details of individuals involved in interviews.
 - Maintain the confidentiality of interview contents and related findings.

Training

- Provide regular training to all employees, volunteers, and contractors on confidentiality and data protection policies and practices.

Monitoring and Review

- Regularly review and update this policy to ensure compliance with legal requirements and best practices.
- Conduct periodic audits to monitor adherence to confidentiality protocols.

Employees who do not abide by our confidentiality policy will face investigation and, possibly, disciplinary action.

Trinity Support Services will investigate every breach of this policy and take the necessary steps for any employee who willfully or regularly breaches our confidentiality guidelines.

Contact Information

For questions or concerns regarding this policy, please contact the Company Directors:

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