

CONFIDENTIALITY POLICY

Approved by Management Committee: 4th October 2017
Date of Review: 4th October 2020

Introduction

The purpose of this policy is to provide guidelines on maintaining confidentiality in all aspects of Causeway's work. This includes all records and information held by the organisation relating to employees, tenants, prospective tenants, Committee members and prospective members, and properties. The aim of this policy is to protect the rights of the individual, in accordance with the Data Protection Act 1998 and General Data Protection Regulation 2018 (GDPR).

1. Management Committee

- 1.1** New MC members will be sent a copy of the Confidentiality Policy and asked to take responsibility for implementing it in relation to their own Committee papers and information disclosed at any Causeway meeting.
- 1.2** Reference to individuals at Committee meetings will be made through the use of a code wherever practicable.
- 1.3** Tenant representatives may be excluded from certain parts of Committee meetings if their presence might jeopardise confidentiality.

2. Personnel

- 2.1** All staff will be given a copy of the Confidentiality Policy as part of their induction. The implications of the policy on their work will be explained.
- 2.2** Personnel files and other staff records will be kept in a locked cabinet. They will only be accessible to the Director/Committee members.
- 2.3** Application forms, interview records and monitoring forms are confidential to Causeway.
- 2.4** When seeking references for a new employee it should be made clear that the information given will be open to inspection by the new employee.
- 2.5** All staff may have access to their files and can request this through management

3. Tenants

- 3.1** Tenants' personal files will be kept in hard copy and electronically only accessible by staff and confidential to members of staff. Tenants may have access to their files by making an appointment with their Housing Manager to visit the office. Any other persons named in the files will not be disclosed due to third party confidentiality.
- 3.2** Applicants for housing may have access to their application forms and may request this through the office.
- 3.3** Tenants taking part in any media event are expected, where appropriate, to consult with other tenants at their address and with Causeway, before doing so.
- 3.4** Staff will only disclose personal information about tenants to other bodies where there is a legal obligation to do so and where it is necessary in an emergency or where they have obtained written consent from that tenant, under the following circumstances: potential criminal activity.
 - 3.4.1** In operating certain procedures (i.e. Complaints, Arrears, Eviction, Allocations) it may be necessary to disclose information about tenants to partner Housing Associations, solicitors, Court officials etc. Tenants should note that complete confidentiality is impossible in these circumstances. In cases of eviction in a shared house all tenants in that property will be notified of the eviction.
 - 3.4.2** Any matter disclosed to an individual member of staff is assumed to be disclosed to the organisation. Staff may not keep individual confidences from their colleagues.
 - 3.4.3** Where a worker has a previous professional relationship with a tenant or knowledge of a tenant from previous employment the worker should disclose the matter to their manager. A decision will then be taken on whether these matters should be disclosed to the team. This will depend on whether the information has serious implications for the welfare of the tenant, other tenants or the organisation. Permission will be sought from the tenant where possible but this may be overlooked if the Director considers it necessary to do so. In any case the tenant will be informed of any disclosure. Similarly a worker may take information to a new organisation only where this is in the interests of the welfare or safety of the tenant, other tenants or the organisation or its staff.
- 3.5** Causeway may provide information to other housing associations, Landlords and mortgage providers regarding a person's rent account and other matters relating to their tenancy if requested to do so.

4. Partner Agencies

- 4.1** Partner agencies will be given a copy of the Confidentiality Policy and will be expected to abide by it. Partner agencies include consultants contracted by the organisation to undertake specific pieces of work.

- 4.2** Management Agreements will specify that breaches of confidentiality by either party will constitute a breach of that agreement.

5. Publicity and Public Relations

- 5.1** Staff and Committee members should only represent Causeway to the media with the prior approval of the Management Committee.

6. Contractors

- 6.1** Contractors are expected to treat any personal information about tenants with the utmost confidentiality.