



Statement of Confidentiality

General Notes

'KMC', 'we', 'our', 'its', 'it', mean Kennington Memory Club, the organisation providing the service. 'you', 'yours' mean the reader of the document.

The right to privacy is essential to ensure that the older person, volunteer or employee has trust and confidence in the organisation and is treated with respect and dignity.

KMC recognises that the principle of confidentiality should extend to any information about the internal affairs of the organisation and should be adhered to by trustees, staff, volunteers and carers.

Any person using, employed by or volunteering at KMC or involved in the governance of KMC has the right to expect that any information imparted by them will be used for the purpose for which it was given and should not be released to any other, inside or outside the organisation, without their consent.

The aim of this statement is to create and maintain an environment where personal dignity and individual rights are respected.

- The Statement of Confidentiality will apply to all personnel records and personal information for staff and volunteers including information obtained through recruitment procedures.
- KMC will need to keep written and/or digital records of members. This information will be kept securely in a locked receptacle and accessed only by staff, or approved volunteers or trustees as necessary.
- Permission will be sought to collect this information and the person concerned must be informed of their right of access to it. Information should only be collected when it is necessary for a specific purpose. All those providing information to KMC have a right of access to the details KMC holds in whatever form and should submit any requests to KMC's Data Protection Officer
- Information/records will be stored securely, observing the provisions of the General Data Protection Regulation (GDPR) 2018, if on computer. If confidential information is to be disposed of, it will be shredded or otherwise physically destroyed, so that other parties cannot read it. The personal information (data) KMC holds will be that which is necessary to ensure the effectiveness and efficiency of KMC's operations and administration. These data will include, but not be limited to, contact details, dietary and medical details, dates of birth, gender and other identifiers, salaries, bank details and other relevant financial details, as well as details of immediate family and/or carers. These personal data will be as disclosed on KMC forms, or in the course of conversations with the individuals concerned.

- If information is to be divulged to a third party, other than that required by law, consent should be obtained from the person concerned. Where a person is felt to lack the mental capacity to make a decision about divulging details of a particular issue to a third party/agency the staff member, volunteer or carer may use 'implied consent'. This will only follow after discussion with and agreement of a nominated trustee. The incident must be recorded and stored securely. Information will only be disclosed to third parties, other than as required by law, in exceptional circumstances and never for marketing, market analysis or similar purposes.
- In certain circumstances such as 'life and limb' situations it may be necessary/appropriate to divulge information and so breach confidentiality. In such an emergency prior permission is not necessary, but the organiser and the nominated trustee must be informed as soon as possible after the incident.
- In the event of a safeguarding incident or disclosure, staff, volunteers and trustees have a professional responsibility to share relevant information about the protection of vulnerable adults with other professionals. In this situation, the Safeguarding Vulnerable Adults Policy must be followed.
- Any person using, employed by or volunteering at KMC or involved in the governance of KMC should be aware of the Statement of Confidentiality and of their right to complain if information is divulged without their permission. The complaint should follow the procedure set out in KMC's Comments, Complaints and Suggestions Policy.
- The importance of confidentiality and the constraints it implies will become part of the staff and volunteers training programme.
- Breach of confidence is likely to result in disciplinary action, which may involve dismissal. Trustees, staff and volunteers should also be aware that, regardless of any action taken by KMC, a breach of confidence could result in a civil action for damages under the GDPR.

Signed:

Date:

Name:

Position held:

For Review: