



## **Confidentiality**

The Harmony Therapy Trust believes that it has a duty of confidentiality to its beneficiaries. Harmony Trust is governed by the Data Protection Act 2018.

Therapists, Trustees, Volunteers and others who receive confidential or restricted information in the course of their dealings with The Harmony Therapy Trust must not disclose to any unauthorised person/or persons any confidential information about beneficiary/client/patient information, the interests or business of the charity which are not already in the public domain.

A non-exhaustive list of information which the charity considers confidential (unless such information is already legitimately in the public domain) includes:

- any personal information about Beneficiaries, Trustees, Volunteers (other than details published with the consent of the person concerned) such as their name and address, personal, financial or family circumstances;
- information held in relation to funding applications, grant applications, joint ventures, project initiatives, strategic plans, etc (other than those published by the charity for the public consumption);
- financial information than information already in the public domain;
- details of any security arrangements including IT security, e.g. passwords etc; and
- Any other confidential information relating to employees.

When Therapists or Trustees leave the charity they must immediately return any files, documents, reference books and other papers relating directly or indirectly to the charity, or its volunteers, beneficiaries, funders or other partners. This does NOT include therapy records made by a therapist in connection with a beneficiary. Such records are the property of the Therapist and are kept in line with Data Protection 2018, and the expectations and requirements of their own Insurance Company.

Employees, volunteers and Trustees must be particularly alert to requests from the press or other media and should refer such requests to the Chair of Trustees or Founder Trustees before disclosing any information in response to such enquiries.

### **Restrictive information within the Trust:**

Restricted information includes confidential and sensitive information that is restricted to those Therapists, Trustees, Volunteers, who need or receive the information in the course of their work. Restricted information must not be disclosed to anyone else, whether inside or outside the Trust. Restricted information, whether communicated orally, electronically or in writing should always be identified as 'Confidential' and where appropriate 'For (recipient's) eyes only'. Such information may include:

- referral and medical records of client/patients;
- proposals or plans for the future;

- special forthcoming projects, programmes, events or initiatives before they have been announced or publicised;
- financial and statistical information;
- sensitive business information;
- sensitive personal information about existing or potential beneficiaries, Therapists, Trustees or volunteers; or
- information relating to employees or Trustees including applicants for positions or qualifications, leavers or joiners prior to any public announcement’.

### **General rules in support of confidentiality**

Everyone associated with the Trust is encouraged not to:

- take confidential information (in paper or electronic form) off site, unless absolutely necessary and approved by the Trustees;
- use computer software or programmes on any electronic equipment unless they are authorised by the Trust;
- give any press interviews or statements on or off the record without first discussing with the Chair of Trustees or Founder Trustees; and
- write personal letters under the Trust’s banner or from work email addresses.

### **Notes:**

1. Therapists, Trustees and volunteers leaving the Trust will continue to be bound by their obligations of confidentiality even after they have left the Trust, (for whatever reason). Former Therapists, Trustees or volunteers may not make use of non-public information gained in the course of their involvement with the Trust for their own benefit or for the benefit of any other person/s.
2. Nothing in this policy will prevent an individual from making a ‘protected disclosure’ within the meaning of the Public Interest Disclosure Act 1998 (i.e. a legitimate, good faith, ‘whistleblowing’ disclosure).
3. Breaches of this policy by employees or volunteers will be dealt with by the Trustees. Breaches of this policy by Trustees will be dealt with under the process laid down in the Trustee code of conduct.
4. A copy of this Policy is affixed to the Web site page

Review Dated Feb 2020  
Signed Robert Nelson

Next Review Date Feb 2021