



## **TWISTIN TOTS' CONFIDENTIALITY POLICY**

Name of organisation: Twistin Tots / Twistin Tikes / Twistin Tinies (thereafter known as "Twistin Tots")

Twistin Tots is committed to providing a confidential service to its users. No information given to Twistin Tots will be shared with any other organisation or individual without the user's expressed permission.

For the purpose of this policy, confidentiality relates to the transmission of personal, sensitive or identifiable information about individuals or organisations (confidential information), which comes into the possession of Twistin Tots through its work.

Twistin Tots holds personal data about its staff, users, customers etc which will only be used for the purposes for which it was gathered and will not be disclosed to anyone outside of the organisation without prior permission.

All personal data will be dealt with sensitively and in the strictest confidence internally and externally.

### **Purpose**

The purpose of the Confidentiality Policy is to ensure that all staff, members, volunteers and users understand Twistin Tots' requirements in relation to the disclosure of personal data and confidential information.

### **Principles**

- All personal paper-based and electronic data must be stored in accordance with the Data Protection Act 1998 and must be secured against unauthorised access, accidental disclosure, loss or destruction.
- All personal paper-based and electronic data must only be accessible to those individuals authorised to have access.

### **Statistical Recording**

Twistin Tots is committed to effective statistical recording of the use of its services in order to monitor usage and performance.

All statistical records given to third parties, such as to support funding applications or monitoring reports for the local authority shall be produced in anonymous form, so individuals cannot be recognised.

### **Records**

All records are kept in locked filing cabinets. All information relating to service users will be left in locked drawers. This includes notebooks, copies of correspondence and any other sources of information.

### **Breaches of Confidentiality**

Twistin Tots recognises that occasions may arise where individual workers feel they need to breach confidentiality. Confidential or sensitive information relating to an



individual may be divulged where there is risk of danger to the individual, a volunteer or employee, or the public at large, or where it is against the law to withhold it. In these circumstances, information may be divulged to external agencies e.g. police or social services on a need to know basis.

Where a class leader feels confidentiality should be breached the following steps will be taken:

- The class leader should raise the matter immediately with the Employer.
- The class leader must discuss with the Employer the issues involved in the case and explain why they feel confidentiality should be breached and what would be achieved by breaching confidentiality. The Employer should take a written note of this discussion.
- The Employer is responsible for discussing with the class leader what options are available in each set of circumstances.
- If the Employer decides that confidentiality is to be breached then they should take the following steps:

a full written report on the case should be made and any action agreed undertaken. The Employer is responsible for ensuring all activities are actioned.

### **Track & Trace**

Twistin Tots will be adhering to the government's guidance for Track and Trace at classes from September 2020, and going forward (as required) following the reduction of restrictions.

### **Legislative Framework**

Twistin Tots will monitor this policy to ensure it meets statutory and legal requirements including the Data Protection Act, Children's Act, Rehabilitation of Offenders Act and Prevention of Terrorism Act.

### **Ensuring the Effectiveness of the Policy**

All staff will receive a copy of the confidentiality policy. Existing and new staff will be introduced to the confidentiality policy via induction and training.

The policy will be reviewed annually and amendments will be proposed and agreed by the Employer.

### **Non-adherence**

Breaches of this policy will be dealt with under the Grievance and/or Disciplinary procedures as appropriate.



Created by Jacqui Davis Position: Founder/ Owner, Twistin Tots Date created October 2017:  
Last updated June 2022