



Confidentiality Policy

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Context

Fusion Health & Well Being employees and trainers work with many individuals and organisations primarily in the community. As part of their work, they gain information about individuals and organisations that is of a personal or commercial nature. Whilst information gained may not always be immediately recognisable as being confidential the organisation has a responsibility to ensure that all information gained is treated with respect and that strict rules are in place to ensure the confidentiality of information.

Fusion Health & Well Being is also a social business and is required to tender competitively for contracts. It works in partnership with other agencies and submits bids for government and other funding. There is a need to ensure that all information concerning these commercial and quasi commercial activities of Fusion Health & Well Being remain confidential. Commercially sensitive information obtained from third parties should not be disclosed outside the organisation without first obtaining the prior permission of the organisation from where the information was obtained.

It is recognised that there are no fixed and firm rules about what information is confidential and that can be a matter of interpretation. It shall be for the Directors to determine whether any information shall be deemed confidential.

Aims

Within the context within which Fusion Health & Well Being works it is accepted that there is a legislative framework within which the Confidentiality Policy must operate and that there are certain legal responsibilities to disclose information if requested to do so by statutory and other authorities. Working within that framework the aims of the policy are to

- maintain commercial confidentiality.
- safeguard individual, organisational interests and security
- ensure protection of individual privacy and safety
- contribute to organisational accountability.

Underlying Principles

The following principles underlie the policy and procedures.

- all information will be treated as open unless specifically excluded for reasons of personal information or commercial sensitivity, as outlined below.
- no commercial information shall be disclosed outside the organisation unless agreed by the Directors or unless it is an integral part of partnership negotiations.
- all personal information should be treated as confidential unless the organisation is legally required to make it available to third parties and in such cases the person to whom the confidentiality is owed will be informed that disclosure will be made.

- confidential information will only be shared with other appropriate employees on the basis of a genuine need to know. A genuine need to know shall be defined as 'where the lack of information has a detrimental effect on the ability to deliver the service, has a serious financial impact on the organisation, could lead to breach or potential breach of legislation (including health and safety) or which could lead to any other substantial consequence or high risk to the detriment of the organisation'.
- all employees have a right to know what information is held about them, should be the only person with a right of access, except where there is a risk of harm, or a third party would be identified who has not given their consent
- individuals must give their informed consent before information is shared or disclosed outside the organisation.
- information will only be held for periods required by law

Use of Information

- Information is kept enabling Fusion Health & Well Being to deliver the most appropriate services.
- Fusion Health & Well Being has a capacity building role in putting people in touch with voluntary organisations and may keep contact details where appropriate.
- Information about participants, past participants and potential participants is given to trainers, training organisations, and other relevant government agencies.
- Information about gender, ethnicity and disability of employees and participants (past, present and potential), is kept for the purpose of monitoring our equality policy and reporting to statutory and other agencies including funding bodies.