



GATEWAY INTO LIFE

CONFIDENTIALITY POLICY



1. Introduction

Confidentiality is one of the most important policies and principles we have. It is essential that all staff and volunteers are briefed on this policy. It is also essential that tenants ('tenants' are the occupiers and includes 'licensees' when applicable), staff, volunteers, churches, investors know that we will retain confidentiality at all times regarding their affairs and concerns. It is also a legal requirement with data protection laws.

2. Policy Summary

This Gateway into Life Policy also applies to Hope into Action Northumberland and is to ensure all staff and volunteers comply with the highest standard of confidentiality as laid out in the below procedures. Clear breaches of confidentiality will be dealt with as misconduct with ensuing disciplinary. All staff and volunteers must cover this policy as part of their induction. They must also sign the confidentiality agreement before having access to confidential information and files.

3. Policy objectives

The objective of this policy is to give clear guidance to staff on confidentiality in the following areas:

1. Tenant information
2. Investors
3. Publicity, photos and images used of tenants
4. Communication between staff, churches and tenants.
5. Location of houses and Contractor agreements
6. Information sharing with other agencies.
7. Supporter information
8. Staff and Volunteer files
9. Guidelines for Churches
10. Neighbours

Finally this document outlines the training needed for all staff and volunteers on this information.

4. Procedure

4.1. Tenant information

Tenant information must be kept confidential from supporters and outside enquirers. It will only be shared with staff and volunteers on a "need to know" basis. Filing should comply with the standard tenant filing system. The safe storing of tenant information will be in line with our GDPR policy.

When discussions happen around "the office" we will always refer to those we house as tenants. (This is an important part of the culture of HiAN).

Each tenant will sign a Permission to exchange Information Agreement outlining which agencies they are happy for us to exchange information with. This form, covers sharing of information with church team, investors, publicity, other agencies and family members, in line with our GDPR policy.

It will be explained to tenants that information relating to them will be shared with the church friendship and support group. Therefore assessments cannot be sent to church groups before they have signed this.

Action plans will normally only be shared with the key volunteers involved with the tenant and not more widely.

It will be explained to tenants that certain information pertaining to safeguarding issues may not be kept confidential.

Tenant information will not be given out to unauthorised people, including relatives, who are asking about our tenants. We will not even confirm whether a person being enquired about is a current or historical tenant.

Medical information disclosed by tenants should be kept private to the EW. The tenant may wish to share it with others, but that is their choice. The information should be filed in their on-line folders in the Hope into Action Sharepoint filing system.

4.2. Investors

Whenever referred to in the office or in e-mails we will always refer to the owners of our houses as 'investors'. Investor information will always be kept as confidential.

Investor information will only be kept by the Chair of Trustees and Treasurer. It will not be seen by any other team members. The Operations Director and Executive Director at Hope into Action will also know and have access to this information. Correspondence with the investors will only be from the Chair of Trustees or the Treasurer. It is recognized that from time-to-time support workers will find out and even meet investors.

Support workers must comply with the need for confidentiality in such circumstances.

4.3. Publicity, Social Media, photos and images used of tenants

In our information, publicity and advertising activities, we shall recognize our tenants as dignified human beings, not hopeless objects.

Names of tenants will never be used unless given express permission.

Often, if telling a story, names, locations and other details maybe changed in order to protect our tenants.

No photos will be used without the written permission of our tenants. Written permission will last for 1 year after the tenant has moved on, after that further permission will be required.

4.4. Communication between staff and Friendship and support groups.

Communication between staff and friendship and support groups is important. Once tenants have signed the Permission to exchange Information Agreement they agree that their information can be shared between HIAN staff and Friendship and Support group members. E-mails or What's app can be used as means of communications. These messages cannot, however, be forwarded to anyone outside of the group.

Even within that, sensitive and safeguarding information shall not be shared with anyone except the leader of the group and only then on permission of the tenant. However any sensitive or safeguarding information shared with the friendship and support group relating to the tenant must be passed on to the tenant's EW.

Friendship and support groups must never promise to keep information confidential from an EW as this could pose a safeguarding risk.

4.5. Location of houses

The location of our houses will not be shared in any of our publicity.

Photos of our houses will not be of the outside front aspect. News articles will not show shots of the streets or the outside of the houses.

Regular work contractors will sign a non-disclosure agreement prior to working in the house. This will not normally be used for one off work visits.

When purchasing, refurbishing and opening a house we do not inform neighbours of its purpose as we will stigmatize our tenants before they move in.

4.6. Information sharing with other agencies.

Information sharing agreements will be signed with reputable agencies in order to share information. Without that agreement information should not be shared. Information sharing will be in line with our GDPR policy.

4.7. Supporter information

Information on supporters is only shared between Trustees. We will not sell or share their details with any other organizations. We will not publish their details on our site. Address and contact details of supporters (except investors) is held on a spreadsheet by the Chair of Trustees and the Treasurer. Only authorized staff have access to this information. Electronic information on supporters is password protected in line with our GDPR policy.

4.8. Staff and Volunteer files

Staff, volunteer and trustee details will be stored securely in line with our GDPR policy. Files will also be stored on the HiA Sharepoint website that is both secure and constantly backed up. Paper files will be stored in a private location by the Chair of Trustees or Treasurer.

4.9. Guidelines for churches

Some people in supporting churches will get to find out the location of the HiAN house. (Especially if they have to drop furniture or help do the house up) Where possible we keep the location of the house confidential. The average church member should not know where the house is. However, the more the wider church can be informed of progress the better. It should be along the lines of:

- 'Please pray for house purchase to go through smoothly.'
- 'Please pray for the friendship and support group leaders as they coordinator the most difficult phase of the project - getting the house ready and tenants in.'
- 'Please pray for the assessment team as they meet prospective tenants that God would give them wisdom and discernment'
- We are moving our first 2 tenants in this week – please pray for them and the team.
- Thank the Lord for raising £200k of investment to help the poor and needy in our community!
- One of our tenants is struggling with an issue. Can we just pause and pray for them!

4.10. Neighbours to our houses

We have a policy of not routinely telling the neighbours that we are housing vulnerable people. We only let them know we are a landlord and that is it. The reason we do this is to prevent stigmatising the tenants. In the event a neighbour finds out or there is a complaint we ask the neighbour to respond as they would with anyone else. (Talk to the tenant, if necessary involve the police) Always say they should react 'fast & strong' and deal with the issue head on. Where a neighbour complains to us we will speak to the tenant and we will encourage the tenants to apologise to their neighbours and, if needs be, meet with neighbours and re-assure them. In extreme circumstances or where problems persist it may be necessary to issue a formal warning to the tenant.

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