



Confidentiality Policy

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1 CONFIDENTIALITY – OVERALL STATEMENT OF POLICY

All employees working for 1st Homecare will have access to, or come into contact with,, information that is confidential. This includes all information regarding 1st Homecare's clients.

This Policy sets out the things that employees must and must not do to ensure that all confidential information is kept confidential. It is the duty of every employee to comply with this Policy. Each carer will be given his or her own personal copy of the Employee Handbook on joining, which forms part of his/her terms and conditions of employment, and this includes an agreement on the protection of confidential information. During induction training, employees will receive training on confidentiality.

Employees must in addition observe the provisions on confidentiality contained in any codes of conduct that relate to their position as an adult social care worker. Employees will have been informed of such code and given a copy, during induction.

Unauthorised disclosure of confidential information will be a breach of employment law duties to the Company and may also breach laws on data protection and human rights. Unauthorised disclosure is regarded as so serious a matter that it would normally result in disciplinary action, with dismissal as a possible outcome.

2 PROTECTION OF CLIENT INFORMATION

Confidential client information

All information regarding clients is treated with the utmost confidentiality. This includes the information that 1st Homecare obtains when taking on clients, information disclosed by clients to carers, and information disclosed to 1st Homecare and/or carers by third parties e.g. by social workers, district nurses or others involved in the care of the client. Types of confidential information will include:

- Information about where the client lives, entry codes to their property, their contact numbers, and the contact numbers for and personal details regarding their relatives or representatives
- Information about the client's medical history, medical condition and treatment, the care they receive, details of medication the client takes, and other information contained in their Care Book
- Information about the client's private life and preferences, including information about sexual orientation

When it may be necessary to disclose information

All clients, their relatives or representatives, need to be certain that personal information concerning the client is handled appropriately. They need to be certain that their personal confidences are respected and that their rights to confidentiality are upheld and

maintained at all times. Employees should be very careful not to disclose confidential information regarding clients to anyone not authorised to know the information.

There are a few limited occasions where disclosure may be necessary, for example:

- if there are legal requirements to disclose information
- if a client has told a carer something in confidence that alerts the carer to a possible safeguarding issue

If a situation arises where an employee thinks information may need to be disclosed but is uncertain whether they can release the information, the employee should contact the Office or the On call manager first to get confirmation whether the information may be disclosed.

What employees should do to protect information

To ensure that confidential information is protected, it is of the utmost importance that you comply with the following:

- Do not disclose client information that you are not authorised to disclose
- Do not disclose information about clients to any person not authorised to know it
- Do not disclose any information about a client – even their name - to any other clients
- Do not discuss the details of any client with anyone else outside work
- If your rota is in paper form, do keep your copy of the weekly rota in a safe place and not leave it where others not authorised to see the information in it could have access to it and ensure it is safely destroyed after use
- If the weekly rota is kept on a smart phone, ensure it is password protected with a secure password that is not obvious
- Do keep the key safe numbers of clients safe – this includes making sure that when entering the key safe, there is no one watching over your shoulder, ensuring that the key safe number is not left visible on the key safe, and ensuring it is closed properly
- Do password protect any computer, smart phone, blackberry, mobile phone or other device on which any client information is stored
- Do log off when leaving unattended any computer, I-pad or other device on which client information is held so that no unauthorised person can access it
- Do ensure that you are the sole user of any of the devices mentioned in the previous two points – you should not keep client information on any device you share the use of
- Do not access or view information belonging to or held by 1st Homecare that you are not authorised to access or view
- Do not allow any person who is not a 1st Homecare employee or otherwise authorised by 1st Homecare, to accompany you when attending a client. This includes not allowing another person to wait outside client's homes
- Never write about any client, their relatives or representatives, or disclose any information regarding clients, on a social media site e.g. Facebook or Twitter

- Never give information in any form regarding clients to newspapers, magazines, TV or radio.

Storage of client information

All information regarding clients that is held by 1st Homecare is stored securely. All information held on computer is stored on systems that are secure, password protected, and that regularly back up the information and are accessible only by Office staff. Documents used for the care of the clients, such as Care Plans, risk assessment forms etc are accessible by carers in the Care Book kept at the client's home. The Office is never left unattended during the day, and outside office hours is kept locked.

Clients who wish to receive a copy of their personal data held by the Company on a computer or in written records should contact the Registered Manager in writing. The Company's Data Protection Policy should be referred to.

3 PROTECTING THE INTERESTS OF 1ST HOMECARE

Confidential information regarding the Company

All staff must be aware that information relating to the business activities of 1st Homecare is regarded as strictly confidential. Such information may include:

- operational reports or policies
- information regarding fees or pricing rates
- financial accounts
- budgets
- information of a commercial, financial or strategic nature
- bids that 1st Homecare plans to tender for
- information about staffing and recruitment, including details of prospective employees or past employees
- details of current investigations or disciplinary processes
- information regarding complaints
- any information held by 1st Homecare regarding the business of a third party
- information regarding the carers and management of 1st Homecare

Employees may become aware of this information in different ways, for example, they may directly have access to it through their job or they may become aware of it through disclosure by another employee.

Keeping the information confidential

In whatever way an employee may have become aware of this information, they must remember that disclosing it to unauthorised parties could damage the business and disclosure is therefore not allowed without 1st Homecare's express authorisation. Employees must remember that this includes revealing any such information to clients,

including matters regarding other employees. Apart from the fact that it may damage the business, it is unprofessional behaviour. It may also be a breach of data protection or human rights law. Any such disclosure will be investigated and may result in disciplinary action.

4 PROTECTING STAFF INFORMATION

Each staff member working for 1st Homecare has a confidential staff file containing among other material the staff member's personal details, employment contract, references, results of spot checks, appraisals and supervisions, and training records. In some cases, the file may include information relating to health, records of disciplinary action taken or performance management, or information regarding a grievance or complaint raised. 1st Homecare is a paperless office in terms of employee files – these are stored on computer on PeoplePlanner and Dropbox systems.

All staff related information is kept confidential by the Company. It is stored on systems that are secure, password protected and that regularly back up the information, and are only accessible by Office staff. The Office is never left unattended during the day and outside office hours is kept locked.

Employees who wish to make a subject access request with regard to the personal data held by the Company should contact the Registered Manager in writing. The Company's Data Protection Policy should be referred to in this case.

5 BREACHES IN CONFIDENTIALITY

The overriding duty and obligation for all employees is to safeguard the interests of clients of 1st Homecare. If at any time an employee discloses information that is confidential in circumstances where disclosure is not permitted, the Office must be told immediately.

1st Homecare does recognise that there are occasions where carers may have a legitimate concern that it is appropriate to report to an external authority, in the interests of clients, their families or representatives, or of carers and other employees. 1st Homecare has a Whistleblowing Policy, which is available on the staff section of the 1st Homecare website, or in hard copy in the Office.

Failure to comply with this Confidentiality Policy will be a disciplinary offence and may result in dismissal.

6 GENERAL

1st Homecare may alter or amend this Policy at any time as it considers necessary, and any revised version will replace this version. Employees will be informed of such alterations or amendments.

CHANGE HISTORY

Issue	Date	Description of Change and Reason
1	2012	First issue
2	December 2013	Second issue
3	November 2014	Third issue – minor amendments, formatting, and insertion of a review date
4	April 2016	Fourth Issue – change of address of company and updated section on paperless office
5	February 2017	Fifth Issue – changes to make applicable to both businesses, and some minor changes to tidy up the wording
6	June 2018	Sixth Issue – no substantial changes, only to grammar or references to policies
7	January 2020	Seventh Issue – inclusion of KL Office details

DOCUMENT CONTROL

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