

1. Purpose

This policy outlines how Freeva maintains confidentiality in all aspects of service delivery. It applies to all staff, volunteers, trustees, and contractors working directly or indirectly with clients. The aim is to ensure that clients feel safe to disclose personal and sensitive information in the knowledge that it will be handled respectfully, lawfully, and appropriately.

2. Scope

This policy applies to:

- All service users across Freeva's support services.
- All staff, volunteers, trustees and consultants.
- All personal, sensitive, and anonymised information obtained through service delivery.

3. Core Principles

Freeva is committed to:

- Respecting clients' right to privacy and confidentiality.
- Providing clear information on how data is collected, stored, used, and shared.
- Ensuring informed consent is obtained before any information is shared (except where safeguarding requires otherwise).
- Only sharing relevant and necessary information to promote safety and support outcomes.

4. Client Consent and Information Sharing

Confidential information will not be shared outside Freeva unless:

- The client has given explicit, informed consent.
- There is an immediate or significant risk to the safety of the client, their children, or others.
- There is a legal obligation (e.g. court order, safeguarding duty).

Where information must be shared without consent, we will:

- Share only what is necessary for the purpose.
- Inform the client wherever it is safe and appropriate to do so.
- Record the decision and rationale in the client's case file, including who was consulted and what was shared.

5. Exceptions to Confidentiality

Information may be disclosed without consent in the following circumstances:

- The client or others are at serious risk of harm.
- A child or vulnerable adult may be at risk of abuse or neglect.
- We are required to disclose information by law or a court order.
- A serious crime is disclosed, particularly where there is risk to others.

All such decisions will follow consultation with a senior member of staff and will be reviewed within 48 hours.

6. Client Objections

If a client states they are unhappy with our Confidentiality policy, or refuses consent for their information to be shared, we must explain that whilst clients are not required to share any personal details the support we are able to provide will be limited; however, we will always offer general advice and support.

No identifying information must be obtained from the client and this should be recorded as an anonymous entry on OASIS under Short Term Work.

If a client discloses information regarding significant risks to them or others, we still have a duty to share any information we do know about that client, with or without consent and this must be made clear to the client.

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7. Anonymised Data and Service Improvement

Freeva may use anonymised data for service monitoring, reporting, and research purposes. Clients can choose whether their information is included in this and are assured that it will never include personally identifying details.

8. Access to Information

Clients have the right to request access to their personal information held by Freeva, as outlined in our Data Protection Policy and Subject Access Request procedures.

Freeva may refuse a subject access request if it is deemed manifestly unfounded or excessive. Article 15(4) also allows us to refuse the right to supply a copy of the data if doing so would “adversely affect the rights and freedoms of others”. We may also refuse a request if in order to do so we would also have to disclose information relating to someone else who can be identified but who hasn’t consented to the sharing – provided that it would be unreasonable to do so without that other person’s consent

9. Helpline Call Recordings

All calls to Freeva’s Helpline are recorded for training, monitoring, and quality assurance purposes. Callers are informed of this through a pre-recorded message before the call is connected.

Recordings are stored securely and only accessed by authorised personnel. They are not shared outside Freeva unless required by law or for safeguarding purposes.

Call recordings are treated as confidential information and are subject to the same protections and procedures outlined in this policy and our Data Protection Policy.

10. Staff Responsibilities and Training

All staff and volunteers must:

- Sign a confidentiality agreement during induction.
- Understand and uphold this policy and related procedures.
- Attend mandatory data protection and safeguarding training.
- Report any breaches or concerns immediately to the Chief Executive (Data Protection Officer).

11. Breaches of Confidentiality

Any suspected or actual breach will be taken seriously and may result in disciplinary action. All breaches must be reported to the Chief Executive and managed in line with Freeva's Data Breach Procedure.

12. Policy Review

This policy will be reviewed annually or sooner if there are changes in legislation, regulation, or operational need.

Related Documents

- Data Protection Policy
- Safeguarding Policy
- Confidentiality and Information Sharing Agreement
- Privacy and Confidentiality Statement
- Records Management Policy
- Helpline Engagement Service Confidentiality Statement and Info Sharing documents