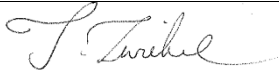


# ***Sunbeams***

## **CONFIDENTIALITY POLICY**

## Document Control Sheet

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Signature	

### Revision History

Version	Date	Author	Description of Change	Approved By
1.0	Sep 2019	Admin	Initial release outlining confidentiality principles.	Board of Trustees
2.0	Sep 2020	Admin	Review	Board of Trustees
3.0	Sep 2021	Admin	Review	Board of Trustees
4.0	Sep 2022	Admin	Clarified information-sharing with external agencies.	Board of Trustees
5.0	Sep 2023	Admin	Review	Board of Trustees
6.0	Sep 2024	Admin	Minor update to consent wording.	Board of Trustees
7.0	Sep 2025	Admin	Review; refreshed layout.	Board of Trustees

## **1. Purpose**

Confidentiality is a cornerstone of trust between Sunbeams, our service users, and the community we serve.

This policy outlines how information shared with Sunbeams is handled, protected, and—when necessary—appropriately shared in line with the Data Protection Act 2018, UK GDPR, and Safeguarding legislation.

## **2. Scope**

This policy applies to everyone involved in Sunbeams' work and to all forms of information (written, spoken, digital, or photographic).

It covers everything from mentoring sessions and supervision notes to administrative, HR, and trustee records.

## **3. Core Principles**

- Every service user and staff member has a right to privacy and to know how their information is used.
- Information is shared only when necessary and lawful.
- All personal data is stored securely and accessed only by those who need it.
- Breaches of confidentiality are taken seriously and must be reported immediately.
- Confidentiality is never used to withhold information where safety or welfare is at risk.

## **4. Building Trust in a Close-Knit Community**

Within the Orthodox Jewish community, people often live and learn in close contact. Sunbeams recognises that staff or volunteers may be approached informally by neighbours, relatives, or community members seeking information.

In all such cases, staff and volunteers must maintain confidentiality and respond simply: "Sunbeams keep all information strictly confidential – I'm afraid I can't discuss individual situations."

If unsure, seek advice from the Volunteer Coordinator or Director.

## **5. Confidentiality in Practice**

- Mentors and staff may share relevant information with their supervisor or Programme Lead for reflective or risk management purposes.
- Identifiable details should only be shared when necessary for safeguarding or practical support.
- Information shared in supervision remains confidential unless it reveals a safeguarding or legal concern.
- Sunbeams obtain parental consent for collecting and storing young people's personal information at registration.

## **6. Limits of Confidentiality**

Sunbeams operate within the law and safeguarding frameworks.

Information will be shared without consent if:

- There is reason to believe a child, young person, or adult is at risk of significant harm or neglect.
- A crime has been, or may be, committed.

- Disclosure is required by a court or statutory body.

Where possible, the individual will be informed that information is being shared—unless doing so would increase the risk of harm.

## **7. Safeguarding and Child Protection**

If a disclosure or concern indicates that a child or young person may be at risk, the Safeguarding & Child Protection Policy takes precedence.

Staff must:

1. Report immediately to the Designated Safeguarding Lead (DSL).
2. Record the concern clearly, using initials only where confidentiality is crucial.
3. Not promise secrecy to any child or young person.

All safeguarding-related disclosures are logged in Sunbeams' secure safeguarding register.

## **8. Information Sharing and Consent**

Sunbeams seek to work openly with families. Information is shared with consent whenever possible, and only on a need-to-know basis.

If consent cannot be obtained—or would place the child at risk—information may still be shared lawfully with safeguarding partners.

Parents and young people are informed after information is shared unless this would cause harm or interfere with an investigation.

## **9. Handling and Storage of Information**

- All paper records are stored in locked cabinets.
- Digital records are stored on password-protected systems with access restricted to authorised staff.
- Confidential conversations should take place in private rooms.
- Case notes and reports must be factual, respectful, and dated.

Records are retained according to Sunbeams' Data Protection Policy, normally for six years, and securely destroyed thereafter.

## **10. Reporting and Breaches**

Any accidental or intentional breach of confidentiality must be reported immediately to the Director and DSL.

A breach form will be completed and, if necessary, the Information Commissioner's Office (ICO) notified.

Serious or repeated breaches may lead to disciplinary action or referral to external authorities.

## **11. Staff and Volunteer Responsibilities**

All individuals working with Sunbeams must:

- Sign a Confidentiality Agreement during induction.
- Always Follow this policy and the Data Protection Policy.
- Use professional judgment and supervision to decide what information should be shared.
- Never discuss cases outside appropriate professional contexts.

## **12. Training and Awareness**

All staff, mentors, and volunteers receive training on confidentiality, data protection, and information sharing during induction and annual safeguarding refreshers. This policy is reinforced through supervision and team meetings.

### **13. Monitoring and Review**

The Director and Trustees review this policy annually to ensure compliance with data protection legislation and best practice. Lessons from breaches or complaints are incorporated into future training and policy updates.

### **14. Linked Policies**

- Safeguarding & Child Protection Policy
- Data Protection & GDPR Policy
- Whistleblowing Policy
- Code of Conduct
- Volunteer Policy
- Disciplinary Policy

Signed: \_\_\_\_\_ Position: Trustee  
Date: \_\_\_\_\_