



Confidentiality Policy

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Introduction

Prism LGBTQ has a duty to ensure that the information that it holds or processes is managed appropriately and within legal requirements. These include those requirements as set down in general Data Protection regulations (see Data Protection Policy), and Safeguarding Children & Vulnerable Adults legislation (see Safeguarding Policy).

One of the most important roles of Mentors is to facilitate one-to-one conversations with Members which may concern private and personal matters. These conversations as well as any other personal data should be kept confidential and in general should not be shared with any external parties unless it is deemed that someone may be at risk of harm then reporting safeguarding concerns is more important than upholding privacy.

The contents of private conversation between a Mentor and Member, as well as any personal data relating to a Member should not be shared with other Prism Members under any circumstances. Information relating to Prism Members can and should be shared between Mentors.

It is important that all Members are aware of this confidentiality principle and its exceptions, especially when disclosing information to Mentors.



This Policy and its implementation will be reviewed as required to keep in line with changing legislation and at least every three years.

If any training needs are identified relating to this policy or its implementation then these will be met as appropriate.

All Prism LGBTQ Mentors must abide by this Policy. Any breach of this Policy will be investigated and may result in disciplinary action.

Section 1 - Types of Information Held By Prism LGBTQ

Information held by Prism LGBTQ may be written or verbal.
It will include the following categories:

- (a) Personal information relating to Mentors or Members (eg phone numbers, postal addresses, CVs, etc).
- (b) Particularly sensitive information about Mentors or Members (eg details of one-to-one sessions, referrals to other organisations, etc).
- (c) Certain information relating to the organisation or its services (eg minutes of our committee meetings, etc)

Section 2 - Disclosure Within Prism LGBTQ

Within Prism LGBTQ, the majority of personal and particularly sensitive information (i.e. types a) and b) above) regarding Mentors and Members will be accessible by the Mentors and designated officers only. It will only be available to the rest of the Prism Management Committee (PMC) to the extent that it is directly necessary to their responsibilities (unless the individuals concerned have agreed to wider disclosure).

Any individual has the right to inspect information that we are holding about them (under GDPR).

All other information falling within type c) above should be handled with due thought to the reasons and consequences of making the information known to others within the organisation whilst also being as transparent as possible. For instance, considering at what stage it is best to tell Members about events that are being planned.



Section 3 - Disclosure Outside Prism LGBTQ

Prism LGBTQ recognises that it is a matter for individuals to decide whether they wish their personal details to be publicly known, and similarly for organisations whether they wish their contact details to be publicly known. In general, therefore, such information should not be disclosed outside Prism LGBTQ unless the individuals/organisations concerned have explicitly given their consent or have themselves published the information in written (including electronic) or verbal format.

Prism LGBTQ may disclose or publish information in a form where the individuals/organisations concerned cannot be identified, eg general statistics about our membership.

All information about our organisation or services should be handled with due thought to the consequences of making the information known. For instance, the location of our youth group is on a need-to-know basis.

No discussions of a confidential nature will be held in the presence of an individual who is not a Prism Mentor.

Section 4 - Disclosure Required by Law, Court or Tribunal

Disclosure of information may in certain circumstances be required by law or by a court or tribunal - e.g. for the prevention of crime, or the police acting under mandate from a Court.

The PMC or the Mentors (whichever is more appropriate) should tell the individuals concerned to provide the required information as soon as any decision has been taken.

Section 5 - Disclosure requested by the Police, solicitors and other authorities

Information requested by the police, solicitors and other authorities on individuals (without specific legal authority as at section 4 above) should not normally be provided unless those concerned have given their consent and disclosure has been specifically authorised by the PMC or the Mentors (whichever is more appropriate).

It is recognised, however, that there may be exceptional circumstances (e.g. client abuse, safeguarding, financial irregularities) where it would be right to provide information without the consent of those concerned being obtained or even sought. Those concerned should normally be advised that such information has been provided. Please see Prism Safeguarding Policy for more information.



Section 6 - Press & Media

Personal information on individuals, and contact details for organisations, should not be provided to the media unless those concerned have given their consent.

Members are advised that when attending a Prism LGBTQ event in a public space they may be photographed by members of the public or media organisations.

Section 7 - Security of Information

Personal information on individuals, and contact details for organisations, must be kept on secure computer files - in the case of Prism LGBTQ, the Google Drive connected to our email account - or on the Prism email account, except where disclosure is permissible as discussed above.

Access to all such securely held information shall be limited to the designated officers - Chair, Secretary and Treasurer.

The need for particular information in these categories to be held securely, and indeed the need for it to be retained at all, shall be reviewed from time to time by the Mentors. Where information does not need to be retained, it should be securely disposed of.

Prism LGBTQ will comply with the requirements of the Data Protection Act 1998.