

## SECURITY AND CONFIDENTIALITY POLICY

Security for Huntingdon Area Money Advice (HAMA) falls into three categories:

1. The management and protection of HAMA client data, employee, volunteer and management team data, in order to carry out day-to-day operations and to comply with legal obligations
2. Confidentiality
3. Workplace safety

### 1. Data management

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data processor's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

HAMA complies with its obligations under the GDPR, which describes how we must collect, handle and store personal information and expects all volunteers/employees to manage HAMA individual's data and confidential information in line with this policy.

Volunteers/employees must comply with the following rules for handling HAMA's information and equipment:

- HAMA client files should be stored on SharePoint and/or within a locked filing cabinet and e-mails should be organised logically in folders for quick retrieval and reference.
- Files, copies of emails or printouts should not be left out where unauthorised people can see them at any time.
- Data will be securely destroyed when it is no longer needed or if HAMA agrees to an individual's request for the destruction of their data unless legislative requirements mean HAMA is required to retain data.
- Computers holding HAMA volunteer, employee and/or client data will be password protected and advisers will use encryption, a password protected screen lock on the computer and lock paper files away whenever they leave their desk.
- Desktops, laptops and any other HAMA owned equipment will be kept in a secure room/building when unattended.
- Laptops and any other HAMA owned equipment will not be left unattended in any public place. All laptops and computers will be shut down when being transported away from a secure location. If left in a car, equipment must be out of sight and the vehicle locked. Equipment must not be left in a car overnight.



- Failure to comply with these requirements leading to the loss of HAMA data or HAMA owned equipment will lead to management investigation and possible disciplinary action.
- When a member of staff/volunteer leaves HAMA, all data and all equipment belonging to HAMA, must be handed back to the Centre Manager or senior adviser.

Under GDPR, all HAMA clients are entitled to:

- ask what information HAMA holds about them and why.
- be given paper copies of all documentation about them or their circumstances that they request.
- be informed how to ensure the information is up to date.
- ask as to how HAMA is meeting its GDPR obligations.
- have the right to request their personal data is erased where it is no longer necessary for the centre to retain such data.
- have the right to withdraw consent to the processing of their personal data at any time.
- have the right to complain to the Information Commissioner's Office (ICO) should they be unhappy as to the way their data is being used or processed.

All HAMA clients can request to see a copy of HAMA's Privacy Notice, and any data that HAMA holds about them by contacting their adviser. Proof of identity will need to be received prior to any information being released.

HAMA clients will be given a copy of their financial statement (where generated) and offered copies of all paperwork generated in line with the Financial Conduct Authority (FCA) regulations.

## **2. Confidentiality**

HAMA believes that principles of confidentiality must be integrated across all aspects of its services and management. We believe our clients deserve the right to confidentiality in order to protect their interests and preserve the debt advice service. Therefore, no information regarding a service user will be given directly or indirectly to any third party external to the staff of the centre without the service user's prior consent.

The postal address, email address and contact telephone numbers of any HAMA volunteers are treated as confidential and will never be disclosed without express permission of the person involved. Personal information about a colleague within HAMA should not be discussed with other colleagues or people outside of HAMA without permission of that colleague.

We recognise that all clients should be able to access our services in confidence and that as far as possible no other person other than HAMA volunteers should ever know that they have used our service without their consent. Clients need to feel secure in using the service in a confidential manner and therefore, where required, they will be afforded confidential

interview space and we will ensure that as far as possible, there is no inadvertent breach of confidentiality.

All advisers will ensure that where any action is agreed to be taken by HAMA on behalf of a client that the client will firstly sign an authorisation form which will be kept in the client's file. All case records, whether held at home or in the office, will be kept securely, as will all information relating to service users such as notebooks, correspondence, calculation sheets and any other source of information. All electronic records and client-related e-mails will only be accessed on a device which is encrypted or has biometric security, and suitably password protected. Confirmation of advice will be given to the client after each advice session outlining what was discussed and if any actions had been agreed and by whom. The client has the opportunity to choose how they wish to receive this confirmation of advice or waive their right to it if they so wish.

All advisers will check with clients what methods of contact are acceptable such as phoning at home or work, email and personal visitation, before any contact is made in these ways.

Statistics gathered to monitor the service for the purposes of identifying any policy issues and to support funding applications will be produced in anonymous form to prevent identification of individual users.

HAMA acknowledges that on rare occasions it may be necessary to break the basic rules of confidentiality. These may be defined broadly as situations where the safety, rights and liberties of other people or the person giving information may be seriously at risk. Also, legal reports may have to be made regardless of the consent of the person involved, for example where HAMA volunteers become aware of risk to a child, risk to life, or of potential terrorist activity. Decisions that are made, and the reasons for them, will be properly recorded.

When confidential information is divulged without consent the individual concerned will be, wherever possible, informed and an explanation of the action given, except where it might result in more harm to other people or when prohibited by law.

Any person, who feels that their confidentiality has been compromised, or who is concerned that inaccurate information is held about them, is encouraged to discuss the matter with a member of HAMA. If the issue is not resolved to their satisfaction, they are entitled to make use of the HAMA Complaints Procedure.

The person with overall responsibility for Data Processing within HAMA is the Centre Manager, who should be informed immediately of any breach of confidentiality or concern over data protection.

The Centre Manager is responsible for reviewing data protection procedures and related policies in line with HAMA's agreed schedule.

The Centre Manager will arrange data protection training and advice for all HAMA staff.

## **Information Commissioners Office (ICO) Contact details**

Tel: 0303 123 1113

<https://ico.org.uk/make-a-complaint/>

### **3. HAMA workplace safety**

It is the intent of HAMA to provide a safe environment for all clients, members of staff, and volunteers. It is also our intent to properly manage any incidents that occur so as to minimise injury and other forms of loss. A well-managed workplace safety programme benefits our organisation and its people in countless ways.

The Centre Manager, with the management team, will be responsible for developing and organising this programme with input from HAMA staff.

The Centre Manager will draw up a risk assessment which will be reviewed in line with HAMA's agreed schedule.

HAMA is committed to ensuring the physical safety of staff and clients within the advice centre environment. However, due to the stressful situations clients may find themselves in HAMA staff may experience hostilities from clients such as physical and verbal assaults, threats, coercion and intimidation, which all constitute acts of violence.

In the Event of an Act of Violence HAMA staff will:

- look to try and defuse the person's anger so that he/she can cool down and talk calmly and rationally.
- maintain composure.
- try to signal for help from a co-adviser who can contact management, security, the police or paramedics.
- listen attentively. Hostile individuals who feel that they have your attention are sometimes less likely to act out physically.
- maintain eye contact which should help to calm the person down because the individual feels that he/she has attention.
- be courteous and patient until help arrives.
- follow the client's instructions and stall for time if the client has a weapon.
- never try to intercept the weapon or act aggressively against the individual.
- retain the right to terminate any advice/employment forthwith.

HAMA staff will talk to the Centre Manager immediately if they observe unusual behaviour in others, feel intimidated, or have any concerns. These concerns will be discussed and recorded in HAMA's incident log.

Based on the CMA Security and Confidentiality Policy 09/18 POL-42

Approved by the HAMA Board of Trustees: 12<sup>th</sup> June 2018

Reviewed and amended 11<sup>th</sup> June 2021

Reviewed and amended 25<sup>th</sup> June 2024  
Next Review June 2027