



## **Confidentiality Policy**

Pathfinder Trust is registered with the Data Protection Registrar and is committed to upholding the principles of the Act.

Any information collected from clients or staff held by us will be confidential, accurate, up-to-date, and no more than is required to fulfil contractual obligations. All records will only be kept for the lifetime of the project/course, or a specified duration for auditing purposes, which will be stated on the enrolment form.

The Act places obligations on us as recorders of personal information to follow the eight following Data Protection Principles (paraphrased):

First Principle: Personal data shall be processed fairly and lawfully.

Second Principle: Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed.

Third Principle: Personal data shall be adequate, relevant and not excessive.

Fourth Principle: Personal data shall be accurate and, where necessary, kept up to date.

Fifth Principle: Personal data shall not be kept for longer than is necessary.

Sixth Principle: Personal data shall be processed in accordance with the rights of data subjects under this Act.

Seventh Principle: Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data.

Eighth Principle: Personal data shall not be transferred to a country or territory outside the European Economic Area.

All enrolment forms will include a statement declaring that Pathfinder, or any organisation Pathfinder is acting on behalf of, will be registered with the Data Protection Registrar and that we/they will adhere to the Data Protection Principles.

All paper records will be stored in a locked facility with access limited to the Data Controller or appointed persons. Similarly electronic records will be stored on password protected servers, with access limited to nominated persons.

In the event of paper-based records having to be transported, this will be the responsibility of an appointed person, and on no account will records be left unattended during transportation. In the case of electronic records any transfer will be made on password protected media, in the safe keeping of an appointed person. On no account will electronic media be transferred by post or courier.

Where paper records have to be sent by post, these will be sent by Special Delivery. In the case of transfer by e-mail a 'Receipt of e-mail' should be requested.

All clients will be given the opportunity to provide 'sensitive' information, if they feel that this will be of use to their mentor/tutor, but any paper record will then be shredded, and not recorded electronically.

Staff who are involved in giving advice will respect the confidentiality of client information and will not pass any sensitive information on to another member of staff, or third party, without the express permission, in writing, of the client. An exception to this is if the client, or a third party, is put at risk by the non disclosure of information, and in this instance Pathfinder Trust would have an obligation to take the appropriate action. Where possible this would be with the consent of the client. See appendix to Confidentiality Policy

All clients and staff have the right to request copies of any records relating to themselves, both paper-based and electronic, and request changes if the information has been recorded incorrectly.

A written request should be made to the Data Controller (Derek Woodcock) who will respond within 5 working days.

Proof of identity will be required before the release of any personal information.

Derek Woodcock  
Data Controller

20/05/2010