

REFUGEES WELCOME

Westminster Road, Macclesfield SK10 1BX (Reg Charity No:1169909)

REFUGEES WELCOME CONFIDENTIALITY & INFORMATION SHARING

This policy sets out Refugees Welcome's policy in relation to the maintenance of confidentiality and data sharing.

All Trustees, Contractors, Advisors and Volunteers are required to abide by this policy.

The policy applies to the confidentiality of all refugee projects and families within them, volunteers, donors and any other individual or organization that has contact with the organization directly or indirectly.

[Volunteers to be referred to the Volunteer Confidentiality Agreement (VCA)]

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CONFIDENTIALITY STATEMENT

Refugees Welcome recognizes the right of all individuals to confidentiality and that they have a right to expect that personal details and all facts and information about them will be kept confidentially and in line with the requirements of the law. It also recognizes that information including racial or ethnic origin, religious beliefs, political opinions and physical and mental health fall within the Data Protection Act's definition of "sensitive data" which is subject to stricter regulation than "ordinary personal data" and where additional conditions must be met for it to be used and disclosed lawfully.

Refugees Welcome believes that the right to privacy, confidentiality and appropriate use of data are essential to ensure all individuals have full confidence in the organization and are treated with respect and dignity. It recognizes that misuse of data can be damaging and distressing and is committed to the principles of the Data Protection Act which provides individuals with protection from unwanted or harmful use of data. Information about an individual will not be divulged or passed to a third party without the individual's recorded consent, except in an emergency where there is a serious Safeguarding Issue or a serious threat to an individual family.

Refugees Welcome is registered with the Information Commissioner Office and handles all data in line with the ICO regulations. (Registration no: ZB396656)

Information Sharing Protocol

Refugees Welcome is part of the multi-agency working and delivery of services under 'Homes for Ukraine' Scheme with Cheshire East Council. However, there is no formal DATA Sharing agreement as part of this contract. Information is shared verbally within confidential RW/CEC meetings, if necessary, on a need-to-know basis for the benefit of evacuees. Cheshire East will share information only with the permission of Ukrainian Evacuees, when requesting support from Refugees Welcome for individuals and families as they move into independent accommodation. This will be via a CEC/CVSCE contract. Information will then be shared with the relevant volunteers by the CVS Supervisor.

Information is shared with Refugees Welcome by Partner organizations (i.e. CAUSN) when Refugees Welcome Support is requested on the same basis.

Refugees Welcome recognizes the responsibility for Safeguarding of all individuals and families in our care whether under a CEC contract or through ongoing support. When required to share information with **Cheshire East Local Safeguarding Children Board, Cheshire East Local Safeguarding Adults Board and the Safer Cheshire East Partnership** this will be done only for the benefit of the individual or family involved via the Refugees Welcome Safeguarding lead and Safeguarding Trustee. This applies to all Refugees Welcome projects whether under contract to CEC or for ongoing support. Information about these organizations is available on the Cheshire East Website.

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All work undertaken as part of any Refugees Welcome project should adhere to this policy and associated government /council policies and organizations as appropriate, whether in partnership with Cheshire East Council or by RW alone as a model of good practice.

All trustees, contactors, advisors and volunteers engaged in the work of Refugees Welcome are required to be made aware of the requirements set out in the Contract Service Specifications between Cheshire East Council and Refugees Welcome where a contract is in place and Refugees Welcome policies.

Information Sharing & Confidentiality

Information Sharing

The support of families requires Refugees Welcome to work with other agencies and where contracted, with Cheshire East Council, to ensure that support is delivered in a coordinated and prioritized way to best meet the needs of individuals and families. Appropriate and timely sharing of relevant information is a vital part of this work. This will ensure adults, children, young people and families get the services they require when they most need them and when they can have the most impact. This will be done with the consent of the individuals /families involved.

Refugees Welcome will share necessary information which will support the Safeguarding of all Children and Adults within Refugees Welcome projects as required by Cheshire East Local Safeguarding Children Board and Cheshire East Local Safeguarding Adults Board.

Confidentiality

Refugees Welcome will ensure that all volunteers keep personal information concerning any individuals / families disclosed to them during any project confidential. Any disclosure of information to a third party must be in accordance with the provisions of the Data Protection Act 1998.

In the event of any doubt arising, when under contract to CEC, the matter shall be raised with the Council for a decision on the matter, the focus being to determine the approach to be taken and to record the reasons for this decision.

Refugees Welcome have appropriate policy and procedures that recognize and maintain an individual and family's right to confidentiality, in line with Cheshire East Council requirements.

Responsibilities of Trustees, Contractors, Advisors and Volunteers

All trustees, contractors, advisors and volunteers will sign a Confidentiality Form to confirm that they are aware they need to maintain confidentially, and that

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without the consent of an individual and/or family their details cannot be released to any organization, or third party involved in the delivery of the services of Refugees Welcome, except with the permission of the individual/family involved for specific purposes.

Refugees Welcome will ensure that they do not use any information which they have obtained because of the services they provide (including, without limitation, any information relating to any individual and/or family) in any way which is inaccurate or misleading.

Record Keeping/Data Sharing

Refugees Welcome will retain the following records:

- a) Financial transactions via the Treasurer and in line with the Financial Accountability Policy, for 6 years.
- b) Recruitment of volunteers including references, DBS checks, interview records, volunteer support session notes and training provided.
- c) Volunteer activities with individuals and monthly activity monitoring forms

Recruitment data and volunteering data records will be held securely on the CVSCE 'Teams' secure server in line with our Service Level Agreement with CVSCE and can be made available to the Council as needed for the purposes of the delivery of support under CEC contracts. Storage for online records is provided by CVSCE through their 'Teams' system with secure controlled access.

These records will be used to provide anonymized data to Cheshire East Council for the purpose of monitoring contracts between Cheshire East Council and Refugees Welcome. They will also enable Refugees Welcome to assess the effectiveness of their activities.

- d) Policies & procedures to support the delivery of Refugees Welcome services.

Policies will be accessible to all volunteers and public in general on our Website www.refugeeswelcome.co.uk and also stored on the CVSCE secure server.

Information required by volunteers for their support roles with individuals and families will be provided by the Volunteer's Supervisor, on a need-to-know basis. Volunteers will not be given information about other individuals and families within RW projects unless necessary to fulfill their role as a volunteer.

Unauthorized Disclosure

In the event of any unauthorized disclosure of information relating to any Cheshire East Council/Refugees Welcome contract the Council must be informed without delay.

If the unauthorized disclosure is made by a volunteer, the Volunteer Supervisor

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will make the referral to the council and notify the Volunteer Project Manager.

For any other unauthorized disclosures, the CVS Supervisor or volunteer will notify the RW Trustee Board members that this has taken place. The Trustees will then take advice about what, if any, remedial action is required. Refugees Welcome will then implement any remedial action required.

Should Refugees Welcome be approached by any person or organization not party to the contract with the Council for contracted services, Refugees Welcome must refer this request to the Council, via the Volunteer Supervisor (if a volunteer approached) or via a trustee (if any other member of Refugees Welcome is approached). Unless otherwise informed, the contact in the Council to refer this to would be the Council Contract Manager.

Any other approaches for information about any of the Refugees Welcome Projects not covered by the Council contract will be referred to the Chair of Trustees or other Trustees for evaluation and consent for any disclosure. This can only be for general information and not for information pertaining to any of the individuals or families supported by Refugees Welcome

Review

This policy will be reviewed annually for currency and accuracy by the Chair of Trustees or individuals delegated by him/her. This does not prevent any changes taking place to this policy at any other time due to changes in practice or legislation.

Policy V2 March 19

Reviewed and amended: Sept 2023

SIGNED By: N. A Campbell
[Trustee/Chair of Trustees]

DATE: 28.9.23

POSITION in REFUGEES WELCOME: Chair of Trustees

Next Review date: Sept 2024

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Key personnel:

Chair of Trustees: Nicky Campbell: 07753619372 gandnacampbell@gmail.com

RW Safeguarding Lead Syrian and Afghan Refugees and Ukrainian Evacuees:
Volunteer Supervisor (CVSCE): Alex Major 01270 763100
alex.major@cvsce.org.uk

RW Designated Safeguarding Trustee: Gill Appleton: 07775 635124
gill@theappletons.net

Cheshire East Contract Manage: Andrew Makin: 07825015603
andrew.makin@cheshireeast.gov.uk