

## Different Minds (ADHD-ASD Norfolk) Ltd

### Confidentiality, Data Protection and Information Disclosure Policy

#### 1. Purpose

This policy outlines the responsibilities of all staff and associated personnel at Different Minds (ADHD-ASD Norfolk) Ltd in handling confidential and personal information. It supports compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the NHS Care Records Guarantee, and all relevant statutory duties and professional codes of practice. It also ensures appropriate and lawful sharing of data with partner organisations under agreed protocols.

#### 2. Scope

This policy applies to all employees, sub-contractors, volunteers, and any other individuals who may have access to personal, sensitive, or confidential data as part of their work with Different Minds (ADHD-ASD Norfolk) Ltd.

#### 3. Policy Statement

Different Minds (ADHD-ASD Norfolk) Ltd is committed to maintaining the highest standards of confidentiality and data protection. All staff are personally responsible for ensuring that any information they handle, access, or share is managed appropriately, lawfully, and in line with professional and organisational expectations.

#### 4. Key Principles

- All personal data must be handled in accordance with the **UK GDPR** and **Data Protection Act 2018**.
- The organisation will uphold the standards outlined in the **NHS Care Records Guarantee**, which ensures individuals can trust that their personal information is protected and used appropriately.
- Information will only be shared with third parties or partner organisations using **agreed data-sharing protocols**, and only when it is lawful, proportionate, and in the best interest of the individual.
- Staff must **only access information necessary** to carry out their job role and must not access records without authorisation.

#### 5. Personal Responsibilities of Staff

All staff and contractors must:

- Treat all information relating to service users, clients, or colleagues as confidential.
- Ensure they understand and comply with data protection laws and this policy.
- Complete mandatory **data protection and confidentiality training**.
- Report any breaches of confidentiality or data security immediately to the Data Protection Officer.
- Ensure that any disclosures of personal data are authorised, justified, and documented.
- Securely store, handle, and dispose of personal data in accordance with organisational procedures.
- Avoid discussing confidential matters in public or non-secure settings.

## 6. Sharing of Information

Information may be shared with NHS bodies, local authorities, schools, or other health and social care partners where appropriate and in line with:

- The lawful basis outlined under UK GDPR (e.g., public task, vital interests, consent)
- Approved **Information Sharing Agreements (ISAs)** or **Memoranda of Understanding (MOUs)**
- The individual's best interests, ensuring their dignity and privacy are respected

## 7. Information Security Measures

- Access to systems and records is role-based and password-protected.
- Personal data stored electronically is encrypted where appropriate.
- Physical records are stored securely in locked cabinets or offices.
- Only authorised devices and systems may be used to store or transmit personal data.

## 8. Data Breaches

Any breach of confidentiality or unauthorised data disclosure must be reported immediately to the Data Protection Officer and will be handled in accordance with the organisation's **Data Breach Policy**.

## 9. Disciplinary Action

Unauthorised disclosure of personal information, breaches of confidentiality, or misuse of data may be treated as a serious disciplinary offence and may lead to dismissal. In some cases, legal action may also be taken.

## 10. Training and Awareness

All staff are required to:

- Undertake annual training on confidentiality, data protection, and information governance.
- Confirm their understanding of this policy and their responsibilities through signed declarations or training records.

## 11. Monitoring and Review

This policy will be monitored for effectiveness and reviewed annually or following any significant legal, regulatory, or organisational change.

### Approved by:

Graham Boulter MSc

Director

Different Minds (ADHD-ASD Norfolk) Ltd

3/4/25 to be reviewed 3/4/26