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Home START

Support and friendship
for families

HOME-START Oldham, Stockport & Tameside (“Home-Start”) INFORMATION GOVERNANCE POLICY AND PROCEDURE

Home-Start Oldham,
Stockport & Tameside (HOST)

This policy contains the following:

- The Procedure for Information Sharing and the Preservation of Confidentiality
- Record Retention Periods (Appendix 1)
- Data Protection Supporting Guidance (Appendix 2)
- Mandatory Privacy Notice (Appendix 3)

Information Governance Policy Statement

Home-Start recognises that the legitimate use of information underpins our service. All information about parents and families is treated as confidential, to be shared only as necessary in support of the volunteer and to assist the family. Home-Start ensures that personal and operationally sensitive information is processed in line with the General Data Protection Regulation (“GDPR”). Any disclosure of confidential information (including personal data) about a family to another person for the purpose of assisting the family is only undertaken with the explicit consent of the parent/s, *except* to protect the welfare of a child or adult at risk *or* in very limited and extremely rare circumstances where a person is suspected of a disclosable offence or terrorism.

Home-Start’s position on data protection and confidentiality is made clear to all connected with it. The trustees of Home-Starts are responsible for ensuring that the requirements of this policy are met throughout the local Home-Start (“Scheme”). Breaches of confidentiality and data protection are treated seriously and may result in the individual concerned being required to leave the Scheme.

All new trustees, employees and volunteers are provided with a copy of this policy (or extracts thereof for volunteers) as part of their induction/ training. All are expected to abide by this policy and procedures, according to their role.

Procedure

1. Families: Information and consent

- 1.1. Families are given clear information, verbally and in writing, which explains Home-Start’s position on confidentiality and their rights under applicable data protection legislation, including their right to request access to their records.
- 1.2. At the initial visit, consent is sought from the family to share general information about the kind and level of support Home-Start is providing:
 - with the referrer;
 - with other agencies currently involved with the family;
 - with funders, where necessary; and
 - for anonymised case studies.

- 1.3. Consent is sought from families who have self-referred to inform their health visitor or other agency, that they have requested Home-Start support and to share general information with them.
- 1.4. Specific consent is sought from the family in order to share additional information as part of local multi-agency arrangements.
- 1.5. Families are informed of any communication between Home-Start and other agencies unless this will impact on the safety or welfare of a child or adult at risk.
- 1.6. Family records are held securely at the Scheme's premises.

2. Safeguarding / Child protection

Where there are concerns about the safety or wellbeing of a child or adult at risk and it is considered necessary for their welfare and protection, information is shared with the appropriate authority in line with Home-Start's Safeguarding and Promoting the Welfare of Children/Safeguarding Adults at risk policies which over-rides this policy.

3. Trustees

- 3.1. Information provided to the board of trustees about families relating to the nature and level of referrals, local trends or case studies to illustrate the work and outcomes of Home-Start are all made anonymous.
- 3.2. Trustees ensure that the confidentiality of families, volunteers and staff, and confidential information relating to the operational work of the Scheme is maintained at all times in line with this policy and the associated procedures. The trustees should agree in what circumstances files will be accessed and by whom, e.g. trustees spot-checking files and contractors.

4. Staff and volunteers

- 4.1. Organisers/co-ordinators discuss the support of families with their line manager. Volunteers discuss their support of families with their organiser/co-ordinator. Discussions take place in a confidential setting, for the purposes of supervision and to ensure the best possible support to the family.
- 4.2. Confidentiality of families and volunteers and confidential information relating to the operational work of the Scheme must be maintained at all times in line with this policy.
- 4.3. Volunteers meeting together for peer support do not share information that may identify or breach the confidentiality of the family they support.

5. Family Groups

Home-Start staff explain the importance of respect and confidentiality as part of a family's introduction to a group, and to any visitors; and this is reiterated in written information provided about the group.

6. External proceedings

- 6.1. External auditors accessing family files for quality auditing purposes do so in the presence of the organiser/co-ordinator and sign and date the Record of Access Form on the inside front cover. They will also need to show their organisation's statement of GDPR compliance.
- 6.2. Where Home-Start is asked by the Police to provide information, the trustees are made aware of the request and Home-Start guidance is followed. Whilst Home-Start would not wish to be obstructive in a police investigation, confidentiality to our service users is of the utmost importance and this will mean that we would normally not pass information to the police unless it fell

the family's consent they are informed of any changes in the nature of support or the family's circumstances as the relationship with Home-Start progresses.

- 10.3. **Multi-agency meetings** - Home-Start staff will attend multi-agency meetings with the family's knowledge and consent, and having discussed with them the information that will be shared, with whom and how it will be recorded. The exception being where there are concerns for the safety or welfare of a child or adult at risk and it would not be safe or practical to do so.
- 10.4. When sharing information about a family it supports, Home-Start adheres to the principle that the information is necessary, proportionate, relevant, accurate, timely and secure. Where professionals unconnected with the particular family are present Home-Start should emphasise the sensitive and confidential nature of the information they are sharing.
- 10.5. Providing reports for multi-agency meetings - information provided about a family in a report is factual, accurate, up-to-date and substantiated and should be in writing. The organiser/co-ordinator discusses the contents of the report with the family prior to the meeting as long as to do so would not increase the likelihood of harm to the child/children/adult at risk.
- 10.6. **Providing reports for Parents** - Information requested in support of a court case will be provided in witness statement format written by a member of staff, not by a volunteer. The witness statement should be approved by the trustees prior to disclosure.
- 10.7. **Commissioners of services** - Evidence of positive outcomes for children and their parents is essential to underpin Home-Start funding applications and for accountability purposes. Home-Start retains statistical records of their support for families and children to meet requirements. Home-Start may also, on occasion produce case studies or other information to demonstrate their support to families and to illustrate the positive impact of this support. When doing so all personal, sensitive or identifying information is removed.

11. Record Keeping & Retention Procedure

- 11.1. Home-Start observes established record retention periods (see Appendix 1) and a process is in place for deleting personal information once it is no longer required.
- 11.2. Family, volunteer, staff and trustee records are confidential, kept in accordance with Home-Start guidance and stored in a locked filing cabinet. It must be explained at the initial visit/interview/induction that a record is maintained about them and that they have the right to request access to it.
- 11.3. Records kept are factual, accurate, up to date, signed and dated by the organiser/co-ordinator and/or administrator. Access for this normal maintenance of the file and for supervision purposes is not recorded. A note of all other access for specific purposes must be recorded (giving reason, date and signature) on the data protection access form at the front of the file, including access by the family, a nominated trustee (agreed by the board of trustees) or HSUK for quality assurance purposes.
- 11.4. Home-Start ensures that all manual or electronic records are password protected/encrypted. All passwords must be complex (containing upper and lower case letters, a number and ideally a symbol) and must be changed regularly.
- 11.5. Data containing personal information, including family, volunteer or personnel files, is backed up and kept securely.
- 11.6. Access to personnel files is restricted to the individual's line manager, to trustee/s if appropriate, and to HSUK reviewers for the purpose of Quality

within one of the exceptions identified in this policy or was subject to an order of a court requiring disclosure.

- 6.3. If a request for information is made by a legal body, such as a solicitor, Home-Start should contact DAS for advice.

7. Support for families

- 7.1. Explain to children and families at the outset how and when information will be shared, including within Home-Start. A privacy notice (containing a suitable consent statement) must be signed at this point. See Appendix 3 for an privacy notice. Such notices will need to be constantly reviewed to ensure they capture sufficient consent to process personal data for the intended purposes.
- 7.2. Explain that information shared may relate to concerns if they arise but could also be positive information about their progress. Explicit consent will be obtained to share specific information relating to the family, the only exception being where there is a risk of significant harm to a child or serious harm to an adult at risk.
- 7.3. Consider the protection, safety and welfare of the child as the overriding consideration when making decisions about sharing information with official safeguarding/child protection bodies.
- 7.4. Wherever possible, however, Home-Start will respect the wishes of children and families when sharing information about them.
- 7.5. Seek advice if in doubt. This may be from the Scheme's strategic lead, local safeguarding board, your safeguarding special adviser or Home-Start UK (HSUK).
- 7.6. Ensure that the information shared is necessary for the purpose for which it is being shared, is shared only with those who need to see it and is accurate and up to date.
- 7.7. Record the reasons for decisions to share or not share information in the family file.

8. Involving children in decisions about their information

Children in families supported by Home-Start will mainly be young children, but where they are mature enough (normally considered to be 12 or over) they are involved in consenting to sharing or processing information about them (also refer to the 'Consent for Children' section in Appendix 2 below).

9. Training and induction

Staff, trustee and volunteer induction and training includes information on their responsibilities with regard to data protection, record keeping, safeguarding/child protection and promoting the welfare of children. This includes signed and dated confirmation of their understanding and acceptance of this policy, the GDPR policy and the Home-Start code of conduct.

10. Liaising with other agencies

- 10.1. If as a requirement of funding, families receiving Home-Start's support have to be registered with a Children's Centre, Sure Start in Northern Ireland or in some areas of Scotland as part of a Children's Plan, this will be fully explained to the family at the initial visit and the nature and extent of any information sharing agreed with the family in advance.
- 10.2. Referrers are informed in writing when Home-Start support starts and the nature of that support, home visiting, group support or a combination of both. They are also informed, again in writing, when Home-Start support ends. With

Assessment review. There must be a data protection access form attached to each file.

- 11.7. Care is taken to ensure that families are not identifiable on notice boards, whiteboards, accessible card index files, social media, websites etc.
- 11.8. Records are securely destroyed in line with this policy (detailed in Appendix 1).
- 11.9. Statistical information about the number and location of families supported and the type of work undertaken may be shared with funders in line with the requirements of the Service Level Agreement or contract. Information that may identify a family is not shared except with the specific permission of the family.

12. Family files

- 12.1 The home-visiting volunteer completes the volunteer diary (family contact sheet) after each visit to the family, and returns them at least monthly to the scheme; these are kept in the relevant section of the family file.
- 12.2 When family support has ceased, the family file will be clearly marked with the expiry date and will be retained and destroyed in strict accordance with the Home-Start Record Retention Periods specified in Appendix 1 of this policy, and will be shredded when the appropriate date is reached. Where it is a requirement of, for example, a funder or local authority to retain files for a longer period this time frame may change.

13. General

- 13.1. Home-Start complies with the Statement of Recommended Practice (SORP) in relation to its financial record keeping and reporting.
- 13.2. Home-Start stores insurance policies and employer's liability insurance certificates securely.
- 13.3. Home-Start stores documents relating to the ownership or leasehold of premises securely.
- 13.4. As an organisation undertaking DBS/PVG/ACCESS NI checks to help assess the suitability of applicants for positions of trust, Home-Start complies fully with legislative procedures and recommended codes of practice regarding the processing of Disclosures and Disclosure Information.

Signature of Chair: 

Name: Geoff Thomas

Date policy adopted: 23rd April 2019

Date to be reviewed: April 2020