

PACTO Confidentiality Policy

Scope

This policy applies to staff, volunteers, services and service users of services provided *directly* by the charity known as Pembrokeshire Association of Community Transport Organisations. Other community transport services and schemes which operate within Pembrokeshire are governed by their own policies and procedures.

Confidentiality Policy

Confidentiality is of paramount importance and is vital in order to protect the safety and reputation of an organisation and the individuals in and affected by it.

1. Confidentiality

- a) PACTO will provide a confidential service to all of their clients and service users. PACTO will not disclose confidential information concerning their trustees, staff, volunteers, clients and service users.
- b) PACTO will only collect and store relevant information that is received by their trustees, staff, volunteers, clients and service users in compliance with the General Data Protection Regulations, EU Regulation 2016/679 and PACTO's Data Protection Policy.
- c) Confidentiality remains with PACTO and their clients and service users and not with an individual and their clients and service users.
- d) Information will remain confidential except where disclosure is allowed (see the points of Disclosure set out below).

2. Disclosure

- a) The disclosure of confidential information to PACTO partner organisations will be allowed where there is a Legitimate Interest (as defined by the GDPR), for example in order to provide a service such as Bus Buddies. Individuals will be told when their information will be shared with other organisations.
- b) The disclosure of confidential information will be allowed with the consent of the individual involved. Permission to disclose information will be requested, in writing from the individual involved. The disclosure of information will be allowed if permission is received in writing from the individual.
- c) The disclosure of confidential information will be allowed if PACTO has reason to believe that a person may be a serious risk to themselves or to other people. The individual involved will be informed, in writing of the reason and action taken for disclosure of this information.
- d) The disclosure of confidential information will be allowed if information regarding a criminal offence has been received by PACTO which may place an individual at serious risk to someone else i.e. vulnerable adults or children. The individual involved will be informed, in writing, of the reason and action taken for disclosure of this information.

- e) The disclosure of confidential information will be allowed if it is necessary to a Tribunal. Information relating to any individual will be confidential within the Tribunal situation.
- f) The disclosure of confidential information will be allowed if specifically requested by a regulation or monitoring organisation of PACTO. This information will remain confidential between the organisations.
- g) The disclosure of confidential information will be allowed if required by law.

Signed on behalf of the Trustee Board.....*Adrian Davies*

Date.....14/5/18.....

Signed on behalf of the Trustee Board.....*R. Deary*

Date.....14/05/2018.....