

HORIZON HOUSING ASSOCIATION LIMITED	CORPORATE POLICY
TITLE	DEALING WITH CONFIDENTIALITY
DATE OF APPROVAL	February 2007
DATE OF REVIEW	February 2012

1. INTRODUCTION

- 1.1 As a publicly accountable organisation, the Association has a responsibility to ensure that it undertakes its business activities to the highest standards of probity and conduct. Horizon is accountable to its members, tenants, sharing owners, other clients and the communities within which it operates.
- 1.2 Horizon is committed to conducting its business openly and making information publicly available unless there are compelling reasons for not doing so. Openness and accountability are essential to enable the Association to demonstrate its commitment to enabling tenants, sharing owners, members and other clients to influence decision-making. However, the Association has to balance this commitment to openness with a requirement for confidentiality in certain areas of its work and the need to protect the rights of customers and staff.

2 AIM OF THE POLICY

- 2.1 The aim of the policy is to outline Horizon's approach to the issue of confidentiality. In order for the Association to operate its business effectively, efficiently and fairly, it is essential that tenants, applicants for housing and other customers can have confidence that any information disclosed to staff will be treated as confidential. Similarly, there are aspects of their employment with the Association in which staff have a right for confidentiality to be maintained.
- 2.2 As with every other aspect of its business, the disclosure of information is governed by legislation, such as the Data Protection Act 1998 and by regulation, such as Communities Scotland's Performance Standards. This policy should be read in conjunction with Horizon's Policy on Data Protection.

3. CUSTOMER INFORMATION

- 3.1 In the course of their work, Association staff will gather or have access to sensitive information about tenants, applicants and other customers. This will include personal, medical, family and financial information which the tenant or applicant will only provide on the basis of confidentiality being guaranteed. On its housing application form, the Association explicitly guarantees that all information supplied will be treated confidentially.

4. GUIDANCE FOR STAFF

- 4.1 All members of staff must treat personal information supplied by tenants, applicants or other customers as strictly confidential. Such information should only be disclosed to other staff on a “need to know” basis. Information can only be disclosed to outside bodies or agencies with the express written consent of the customer.

5. GUIDANCE FOR COMMITTEE MEMBERS

- 5.1 Reports to the Management Committee and constituent sub-committees will be made on an anonymous and aggregated basis, in order to protect confidentiality and avoid potential conflicts of interest. The format of all reports that relate to individual customers or properties will be such that no individual can be identified from these.
- 5.2 One area where an individual could be identified is where a customer pursues a complaint through the Association’s Complaints Procedure and seeks a personal hearing with the Management Committee. In such cases, the expectation of the maintenance of confidentiality will be exactly the same for committee members as for staff.

6. ACCESS TO INFORMATION

- 6.1 The Data Protection Act 1998 introduced certain legal rights to customers to access information about them held either electronically or on paper based files. Horizon’s Policy on Data Protection sets out the position on the provision of access to information by customers and employees.

7. RECRUITMENT OF STAFF

- 7.1 In the process of the recruitment of staff, existing staff or committee members will come into possession of information concerning applicants including that contained in job applications and possibly, references. This information will be treated confidentially and will not be passed on to anyone outside the selection process, or involved in the retention of personnel data.

8. CONSEQUENCES OF FAILURE TO MAINTAIN CONFIDENTIALITY

- 8.1 All staff and committee members are required to maintain confidentiality at all times. A wilful breach of confidentiality will be viewed as a serious disciplinary offence, possibly leading to dismissal for a staff member, or action to remove from membership of the Association for a committee member.

9. REVIEW OF THE POLICY

- 9.1 The Policy on Confidentiality will be reviewed in 5 years.

