

FamilyMatters

exploring better ways of getting on together

Information Governance Policy

Author: Nicola Griffiths January 2014

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Review Due	Reviewed By	Date Reviewed	Date Ratified By Trustees
August 2016	Nicola Griffiths	October 2016	
August 2019			

The Data Protection Act 1998 (DPA) requires a clear direction on Policy for security of information within Family Matters.

This policy will provide direction on IT usage, security against unauthorised access, unlawful processing, loss or destruction of personal information and compliance with the Freedom of Information (FOI) Act 2000.

This policy has been developed in line with The Data Protection Act (1998), The Freedom of Information Act (2000), The Human Rights Act (1998) and The Public Interest Disclosure Act (1998).

These guidelines should be used as a supplement to those documents

1. Data Protection

- 1.1 Family Matters is committed to security of client and staff records.
- 1.2 Family Matters will take steps to ensure that information on families and staff, is not deliberately or accidentally released or (by default) made available or accessible to a third party without the consent, unless obliged to do so by legal or local authority safeguarding processes. This will include staff training on confidentiality issues, DPA principles, working security procedures, and the application of best practice in the workplace.
- 1.3 Family Matters will undertake prudence in the use of, and testing of, arrangements for the backup and recovery of data in the event of an adverse event.
- 1.4 Family Matters will maintain a system of reporting any breaches of this policy through a no-blame culture to capture and learn from any incidents which threaten or breach this data protection policy.
- 1.5 Data Protection will form part of Family Matters' general procedures for the management of risk.
- 1.6 Specific instructions will also be documented within the Family Matters Confidentiality Policy (covering breaches of confidentiality) which will be promoted to all staff.
- 1.7 Any Data breaches need to be rectified within 5 days

2. Freedom of Information (Fol)

Anyone can contact Family Matters directly by letter or email to make a freedom of information request. Requests can also be made verbally and by social media.

Requests should include:

- The individual's name
- An address where they can be contacted
- A detailed description of the recorded information they want

All requests for information under the Fol Act should be forwarded to the CEO, within 24 hours or by Family Matters' next working day so that legal timeframes can be met.

- 2.1 Family Matters will comply with the FoI Act and sees it as an opportunity to enhance public trust and confidence.
- 2.2 Family Matters will maintain a comprehensive 'Publication Scheme' that provides information which is readily accessible without the need for a formal FoI request.
- 2.3 Family Matters will seek to satisfy all FoI Act requests promptly and within the specified 20 working days. However, if necessary we will extend this timescale to give full consideration to a Public Interest test. If we do not expect to meet the deadline, we will inform the requester as soon as possible of the reasons for the delay and when we expect to have made a decision.
- 2.4 Family Matters will continue to protect the personal data entrusted to us, by disclosing it only in accordance with the Data Protection Act 1998.
- 2.5 Family Matters will provide advice and assistance to requesters to facilitate their use of the FoI Act. We will publish our procedures and assist requesters to clarify their requests so that they can obtain the information that they require.
- 2.6 Family Matters will work with other bodies with whom we work to ensure that we can meet our FoI Act obligations, including the disclosure of any information that they hold on our behalf.
- 2.7 Family Matters will apply the exemptions provided in the FoI Act and will disclose information unless the balance of public interest lies in withholding it.
- 2.8 Family Matters will consult with third parties before disclosing information that could affect their rights and interests. However, according to the FoI Act, Family Matters must take the final decision on disclosure.
- 2.9 Family Matters will charge for information requests in line with the FoI Act Fees Regulations or other applicable regulations, including the Data Protection Act 1998.
- 2.10 Family Matters will record all FoI Act requests and our responses and the Service Manager will monitor our performance in handling requests and complaints.
- 2.11 Family Matters will ensure that all staff are aware of their obligations under FoI Act and will include FoI Act education in the induction of all new staff.
- 2.12 This policy has been equality impact assessed.

Family Matters is registered with the Information Commissioner's Office
Registrar Reference Z5637553.

3. IT Usage

- 3.1 All individually allocated usernames, passwords and e-mail addresses are for the exclusive use of the individual to whom they are allocated.
- 3.2 The user is personally responsible and accountable for all activities carried out under their username.

3.3 The user must comply with all relevant legislation and legal precedent.

4. Data Storage

4.1 Family Matters database is securely stored via the web with controlled access rights for users.

4.2 All other confidential/personal information, relating to both families and staff, **must** either be password protected or stored only on the computer that is password protected and be accessible only to those who require it within their role.

4.3 Hard copies of confidential/personal information (eg: files, documents, etc) **must** be kept in locked cabinets overnight. Paperwork should not be left lying around where others can access it.