

Sedlescombe and Westfield Patient Involvement Group
Confidentiality Policy, Conflict of Interest and
Declaration Agreement for Volunteers

26th June 2018 (updated 18/9/18)

1. Introduction

This policy shall apply to all volunteer members of the Patient Involvement Group (PIG). Volunteers shall normally be considered to be those individuals who are not bound to the practice by contract of employment or any other form of contract. Practice staff who have, at any moment in time, responsibility for the conduct and discipline of volunteers within the bounds of the practice shall be required to comply with this policy in relation to ensuring confidentiality awareness in any situation which may arise.

2. Confidentiality

- a) All information held at the practice about patients is deemed confidential whether held electronically or in hard copy.
- b) All information about the practice, including financial and staff records, is also deemed confidential whether held electronically or in hard copy.
- c) Volunteers should not have direct access to confidential information held by the practice. This includes any information concerning an identifiable patient (or a patient who could potentially be identified on the basis of the confidential information). Access to any such information is only permissible with the written authorization of the patient concerned or their authorized representative.
- d) If during the course of his or her activities within the surgery a volunteer overhears or otherwise comes by confidential information, the facts will, as soon as is reasonably practicable, be referred to the Practice Manager or other authorised person within the practice and that information will not be disclosed to any other person.
- e) All matters and information discussed and shared at meetings of the PIG or meetings between PIG members and members of Staff are confidential and not to be shared or disclosed other than information which is already in the public domain.
- f) If a member of the PIG resigns, retires or leaves the Group they must not under any circumstances share confidential or sensitive information.
- g) If a situation arises where a patient contacts the PIG member directly, the code of conduct and confidentiality agreement must be adhered to.

3. Definitions

For the purpose of this policy the definitions of the following key words shall apply:

- *Confidential*: something that is intended to be kept secret, classified, restricted or suppressed; something that is personal, private and trusted.

- *Safeguarding*: protecting the safety and welfare of vulnerable individuals such as children and young people and those with a learning or mental or intellectual impairment.

4. Policy – Induction of Volunteers

- At the point of being accepted as a prospective volunteer, an authorised member of practice staff shall brief the volunteer on the contents of this Confidentiality Policy and of its paramount importance to the business of the practice, staff and patients alike.
- Prior to commencing any authorised activity or duties within the practice, an authorised member of practice staff shall also ensure that the volunteer has read and understood the document titled 'Guidelines for Volunteers - Confidentiality' (below) and is aware of their safeguarding obligations.
- The authorised member of the practice shall then ensure that the volunteer is committed to complying with this policy and also with the Confidentiality Guidelines and is advised of the disciplinary consequence of failing to do so. Breaking the Data Protection Act could have legal implications and would mean that the volunteer could no longer continue in that role.
- A volunteer and PIG member who satisfies the preceding elements of this policy shall then be invited to sign a declaration in the presence of the authorised member of practice staff.

5. Responsibilities

- Any safeguarding issue must be reported immediately to the Practice Manager.
- All information relating to practice staff and patients shall be considered confidential at all times. This information may be spoken, documented, or electronically stored, transmitted or displayed on any kind of electronic device.
- All information relating to a patient's identity, presence at and/or reason for visiting the practice, even within the physical boundaries of the practice (including any area occupied by an associated activity, for example, a pharmacy) is equally confidential. This extends to the identity of anyone accompanying the patient at the time of said visit.
- Any unauthorised disclosure is a breach of confidentiality and may be regarded as an absolute disqualification from volunteer status.
- Any member of the group who resigns, retires from the PIG or leaves for whatever reason must not disclose or share information obtained whilst a member of the group

Guidelines for Volunteers – Confidentiality

1. Discuss your activities with an authorised member of practice staff on a “need to know” basis.
2. Such discussions should be discreet and in private.
3. Oral reporting of your activities should be conducted in private (e.g., with the Group Chair/Practice Lead) or, when it is a part of discussion at public meetings, you should have due regard for discretion and confidentiality.
4. When requesting information from a patient in the Patient Waiting Room, such conversation should be conducted as quietly and discreetly as possible with voices directed away from others who might hear.
5. Where it is easier for the patient to fill in a questionnaire or form they should be invited to do so, but vigilance is then required to ensure that their feedback is not seen by others or lost.
6. Questionnaires, or other forms, completed in the Patient Waiting Room or elsewhere and containing personal details shall be confidential and shall remain in the custody of the volunteer until handed over to the designated member of staff for that activity.
7. When using a phone or other electronic device, make sure that any other conversations within the practice cannot be accidentally transmitted at the same time.
8. During authorised use of computer systems, always ensure that all access codes and passwords are safeguarded.
9. When responsible for a Personal Computer (PC) terminal or Visual Display Unit (VDU) screen, always ensure that the screen is only visible to you, the user. Where necessary, isolate the PC terminal or VDU screen by shutting and locking any access doors. Always log off before leaving the PC/VDU unattended.
10. Always ensure that paper waste containing confidential information is completely cleared away and disposed of safely by shredding on site.
11. Always ensure that any computer accessories you need are owned and screened by the practice prior to use. Privately owned devices must not be used.
12. Do not use practice equipment for own use.

Volunteers shall not:

- Behave contrary to the preceding guidelines/ best practice.
- Disclose confidential information to any unauthorised persons whilst a member of the group and after resigning or leaving the group
- Copy confidential information for any unauthorised use or reason.
- Remove confidential information from the practice premises.
- Take custody of confidential information when not authorised to do so.

Volunteers shall:

Abide by the guidelines of the seven **Nolan Principles of Public Life:**

Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership outlined below and on this website:

<https://www.gov.uk/government/publications/the-7-principles-of-public-life>

- 1. **Selflessness** - Holders of public office should act solely in terms of the public interest.*
- 2. **Integrity** - Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.*
- 3. **Objectivity** - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.*
- 4. **Accountability**- Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.*
- 5. **Openness** - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.*
- 6. **Honesty** - Holders of public office should be truthful.*
- 7. **Leadership** - Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.*

Conflict of Interest

1. Under certain circumstances, Members, Participants and Guests may be deemed to have an actual, perceived or possible conflict of interest. This may be, for example, because of involvement with another Surgery, another PPG or similar, or other aspect/s of healthcare and/or the NHS, CCG or its successor/s or business interests relating to the practice
2. Members must declare any conflict of interest at the commencement of each meeting

Confidentiality and Conflict of Interest Policy
Declaration Agreement for Sedlescombe and Westfield PIG members

This Agreement is designed to ensure the confidentiality of any information gained as a consequence of being a Member, Participant or Guest of any Group, and to ensure disclosure of breaches of confidentiality and/or actual, perceived or possible conflicts of interest from the same cause.

First name:

Last name:

I have read and understood the Confidentiality and Conflict Policy and Declaration Agreement for PIG members.

I confirm that I have been briefed by an authorised member of practice staff and have had the opportunity to ask any clarifying questions.

I undertake to always be aware of the nature and importance of confidentiality and conflict of interest and understand that the consequence of any breach associated to me may mean the termination of my PIG member status within the practice.

On my resignation, retirement, or leaving the Group for whatever reason I undertake not to disclose or share any information obtained during my service with the Group either within or outside the Practice

Dated:

Signature:

Last name: (printed)

Declaration by the authorised member conducting the briefing

First name:

Last name:

I confirm that I have briefed this PIG member in accordance with the Confidentiality Policy and Declaration Agreement for Volunteers.

Dated:

Signature:

Last name: (printed)