



1. Introduction and Statement of Commitment

Neuro Gateway Support Network is committed to maintaining the highest standards of confidentiality in all aspects of its work. The organisation recognises that individuals who engage with its services often do so during periods of vulnerability, distress, or uncertainty, and may share highly sensitive personal information relating to their health, family circumstances, care arrangements, and personal experiences.

The organisation acknowledges that trust is central to its relationship with those it supports. Individuals must feel confident that the information they share will be treated with respect, handled securely, and used appropriately. Maintaining confidentiality is therefore not only a legal obligation but a fundamental ethical responsibility.

This policy sets out the principles, expectations, and procedures that govern how confidential information is managed within *Neuro Gateway Support Network*, ensuring that all information is handled responsibly, lawfully, and in a manner that protects the rights and wellbeing of individuals.

2. Legal and Regulatory Framework

This policy operates in accordance with the legal and regulatory requirements governing confidentiality and data protection within the United Kingdom. In particular, it aligns with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which establish clear principles for the lawful processing and protection of personal data.

The organisation also recognises the importance of the Human Rights Act 1998, specifically Article 8, which provides individuals with the right to respect for private and family life. In addition, the Social Services and Well-being (Wales) Act 2014 and the Wales Safeguarding Procedures provide guidance on the sharing of information where there are concerns about an individual's safety or wellbeing.

The organisation understands that confidentiality must be balanced with safeguarding responsibilities and legal obligations. Where there is a risk of harm, the duty to protect individuals may override the duty of confidentiality.

3. Scope and Application of the Policy

This policy applies to all individuals acting on behalf of *Neuro Gateway Support Network*, including trustees, volunteers, and any individuals involved in delivering services or supporting the organisation's activities.

It applies to all forms of information, regardless of how it is received, recorded, or stored. This includes written records, electronic data, emails, verbal disclosures, and any other form of communication.

The principles outlined in this policy apply at all times, including after an individual's involvement with the organisation has ended. Confidentiality obligations continue beyond the duration of any direct engagement with the organisation.

4. Definition and Nature of Confidential Information

Confidential information is defined as any information that is not publicly available and is shared with the organisation in confidence. This includes information that could identify an individual or relate to their personal, medical, social, or financial circumstances.

In the context of *Neuro Gateway Support Network*, confidential information may include personal details such as names and contact information, information relating to health conditions or diagnoses, details of care arrangements, safeguarding concerns, and records of interactions between the organisation and the individual.

The organisation recognises that even seemingly minor details can be sensitive when combined with other information, and therefore all information provided by individuals is treated with an appropriate level of care and discretion.

5. Principles of Confidentiality

Neuro Gateway Support Network adheres to a set of core principles in maintaining confidentiality. Information will only be collected where necessary to provide support and will only be used for the purpose for which it was provided.

Confidential information will be handled with respect and sensitivity at all times. Access to such information will be limited to those who require it in order to fulfil their role, and it will not be disclosed to third parties without appropriate justification.

The organisation is committed to transparency and will ensure that individuals are informed about how their information is used, including the circumstances in which confidentiality may be limited.

6. Duty of Confidentiality

All individuals acting on behalf of *Neuro Gateway Support Network* have a duty to maintain confidentiality. This duty applies to all information obtained through their role and extends beyond the period of their involvement with the organisation.

Individuals must ensure that confidential information is not disclosed inappropriately, whether intentionally or inadvertently. This includes avoiding discussions about cases in public or informal settings, ensuring that information is not shared with unauthorised persons, and accessing information only where it is necessary for their role.

Failure to uphold confidentiality may result in disciplinary action and may have legal consequences.

7. Information Sharing and Justifiable Disclosure

While confidentiality is a fundamental principle, there are circumstances in which it may be necessary to share information. Any sharing of information must be lawful, proportionate, and justified.

Information may be shared with the consent of the individual, where there is a legal obligation to do so, or where it is necessary to protect the vital interests of an individual. In particular, where there are safeguarding concerns or a risk of harm, the organisation may share relevant information with appropriate authorities without consent.

Decisions to share information will be made carefully, taking into account the potential risks and benefits, and will be recorded clearly. The organisation will always aim to share the minimum amount of information necessary to achieve the intended purpose.

8. Safeguarding and Limits of Confidentiality

Neuro Gateway Support Network recognises that confidentiality is not absolute and that there are circumstances in which it must be overridden in order to protect individuals.

Where information is disclosed that indicates an individual may be at risk of abuse, neglect, or harm, the organisation has a duty to act in accordance with safeguarding legislation and procedures. This may involve sharing information with local authorities, safeguarding teams, or emergency services.

Wherever possible, individuals will be informed that information may need to be shared. However, if doing so would increase the risk of harm, the organisation may proceed without informing the individual.

Safeguarding responsibilities will always take precedence over confidentiality where there is a risk to safety or wellbeing.

9. Storage, Security, and Protection of Information

The organisation is committed to ensuring that all confidential information is stored securely and protected against unauthorised access, loss, or misuse.

Electronic records are stored on secure systems with appropriate access controls, including password protection and restricted permissions. Physical records, where used, are stored in secure locations with controlled access.

Access to confidential information is limited to authorised individuals and only where necessary. The organisation regularly reviews its security measures to ensure they remain effective and appropriate.

10. Communication and Handling of Information

Care must be taken when communicating confidential information, whether verbally or in writing. Individuals must ensure that information is shared only with appropriate recipients and that communication methods are secure.

Emails must be sent carefully to avoid incorrect recipients, and sensitive information should not be shared through unsecured channels. Verbal discussions should take place in private settings where they cannot be overheard.

When leaving messages or communicating through shared devices, care must be taken not to disclose sensitive information unnecessarily.

11. Record Keeping

Accurate and appropriate record keeping is essential for both service delivery and accountability. Records should be factual, relevant, and proportionate, and should only include information necessary for the purpose of providing support.

Records must be stored securely and retained in accordance with the organisation's Data Protection Policy. Access to records must be restricted, and records must not be retained longer than necessary.

12. Breaches of Confidentiality

A breach of confidentiality occurs when information is disclosed, accessed, or used inappropriately or without authorisation. This may include accidental disclosure, loss of information, or unauthorised access.

All breaches, whether actual or suspected, must be reported immediately. The organisation will assess the nature and impact of the breach and take appropriate action to mitigate any risks.

Where required, breaches will be reported to the Information Commissioner's Office, and affected individuals will be informed where there is a risk to their rights or wellbeing. The organisation will review any breach to identify lessons learned and to prevent recurrence.

13. Responsibilities and Accountability

The trustees of *Neuro Gateway Support Network* have overall responsibility for ensuring that the organisation maintains high standards of confidentiality and complies with legal requirements.

A designated lead may be appointed to oversee data protection and confidentiality practices. All individuals acting on behalf of the organisation are responsible for understanding and applying the principles set out in this policy.

14. Training and Awareness

The organisation is committed to ensuring that those involved in its work understand the importance of confidentiality and their responsibilities in maintaining it. Individuals will be expected to familiarise themselves with this policy and apply its principles consistently in their work.

15. Policy Review

This policy will be reviewed annually or sooner if required to ensure that it remains aligned with current legislation, guidance, and best practice.

16. Final Statement

Neuro Gateway Support Network is committed to protecting the confidentiality, privacy, and dignity of all individuals who engage with its services. The organisation recognises that maintaining confidentiality is essential to building trust and ensuring that individuals feel safe to seek support.

By adhering to the principles set out in this policy, the organisation aims to ensure that all information is handled responsibly, ethically, and in a manner that protects both individuals and the integrity of the organisation.