

TRINITY MONEY ADVICE LEICESTER

SECURITY POLICY

Security for Trinity Money Advice Leicester (“TMAL”) falls into three categories:

1. The management and protection of TMAL client data, employee, volunteer and management team data, in order to carry out day to day operations and to comply with legal obligations.
2. Confidentiality.
3. Workplace safety.

1. Data management

Personal data relates to a living individual who can be identified from that data.

Identification can be by the information alone or in conjunction with any other information in the data processor’s possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (“GDPR”).

TMAL complies with its obligations under GDPR which describes how we must collect, handle and store personal information and expects all volunteers/employees to manage TMAL individual’s data and confidential information in line with this policy.

Volunteers/employees must comply with the following rules for handling TMAL information and equipment:

- TMAL client files should be stored on Catalyst and/or within a locked filing cabinet and e-mails should be organised logically in folders for quick retrieval and reference.
- Files, copies of emails or printouts should not be left out where unauthorised people can see them at any time.
- TMAL data not held on Catalyst will be backed-up regularly (minimum monthly) onto an external hard drive or disks and stored in a secure location.
- Data will be securely destroyed when it is no longer needed or if TMAL agrees to individuals’ requests for the destruction of their data unless legislative requirements mean TMAL is required to retain data.
- Computers holding TMAL volunteer, employee and/or client data will be password protected and advisers will use a password protected screen lock on the computer, log out of Catalyst and lock paper files away whenever they leave their desk.
- Desktops, laptops and any other TMAL owned equipment will be kept in a secure room/building when unattended.
- Laptops and any other TMAL owned equipment will not be left unattended in any public place. All laptops and computers will be shut down when being transported away from a secure location. If left in a car, equipment must be out of sight and the vehicle locked. Equipment must not be left in a car overnight.
- Failure to comply with these requirements leading to the loss of TMAL data or TMAL owned equipment will lead to management investigation and possible disciplinary action.
- When a member of staff/volunteer leaves TMAL, all data, and all equipment belonging to TMAL must be handed back to the TMAL’s Centre Manager.

Under General Data Protection Regulation (GDPR), all TMAL clients are entitled to:

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- ask what information TMAL holds about them and why.
- be given paper copies of all documentation about them or their circumstances that they request.
- be informed how to ensure the information is up to date.
- ask as to how TMAL is meeting its GDPR obligations.
- have the right to request their personal data is erased where it is no longer necessary for the centre to retain such data.
- have the right to withdraw consent to the processing of their personal data at any time.
- have the right to complain to the Information Commissioner's Office (ICO) should they be unhappy as to the way their data is being used or processed.

All TMAL clients can request to see a copy of TMAL's Privacy Notice, and any data that TMAL holds about them by contacting Centre Manager (Charles Franks) at contact@trinitymoneyadvice.org.uk or their adviser. Proof of identity will need to be received prior to any information being released.

All TMAL clients will be given a copy of their financial statement and offered copies of all paperwork generated in line with the Financial Conduct Authority (FCA) regulations.

2. Confidentiality

TMAL believes that principles of confidentiality must be integrated across all aspects of its services and management. We believe our clients deserve the right to confidentiality in order to protect their interests and preserve the debt advice service. Therefore, no information regarding a client will be given directly or indirectly to any third party external to the staff of the centre and CMA support staff without the client's prior consent.

The postal address, email address and contact telephone numbers of any centre staff are treated as confidential and will never be disclosed without express permission of the person involved. Personal information about a colleague within TMAL should not be discussed with other colleagues or people outside TMAL and CMA support staff without permission of that colleague.

We recognise that all clients should be able to access our services in confidence and that no other person outside TMAL staff and CMA support staff should ever know that they have used our service, without their consent in writing. Clients need to feel secure in using the service in a confidential manner and therefore, where required, they will be afforded confidential interview space. We will also ensure that, as far as possible, there is no inadvertent breach of confidentiality.

All advisers will ensure that where any action is agreed to be taken by TMAL on behalf of a client that the client will firstly sign an authorisation form which will be kept on file. All hard copy case records will be kept in a locked secure filing cabinet when not in use, as will all information relating to clients such as notebooks, correspondence, calculation sheets and any other source of information. All electronic records will be suitably password protected. Confirmation of advice will be given to the client after each advice session outlining what was discussed and if any actions had been agreed and by whom. The client has the opportunity to

choose how they wish to receive this confirmation of advice or waive their right to it if they so wish.

All advisers will check with clients what methods of contact are acceptable such as phoning at home or work, email and personal visitation, before any contact is made in these ways.

Statistics gathered to monitor the service for the purposes of identifying any policy issues and to support funding applications will be produced in anonymous form to prevent identification of individual users.

TMAL acknowledges that on rare occasions it may be necessary to break the basic rules of confidentiality. These may broadly be defined as situations where the safety, rights and liberties of other people or the person giving information may be seriously at risk. Also, legal reports may have to be made regardless of the consent of the person involved. For example, where staff become aware of risk to a child, risk to life or of potential terrorist activity. Decisions that are made, and the reasons for them, will be properly recorded.

When confidential information is divulged without consent, the individual concerned will be, wherever possible, informed and an explanation of the action given, except where it might result in more harm to other people or when prohibited by law.

Any person, who feels that their confidentiality has been compromised, or who is concerned that inaccurate information is held about them, is encouraged to discuss the matter with a staff member. If the issue is not resolved to their satisfaction, they are entitled to make use of TMAL's published complaints procedure.

The person with overall responsibility for Data Processing within TMAL is the Centre Manager, Charles Franks. His contact details are: contact@trinitymoneyadvice.org.uk or 0116 319 2636. If there is any breach of confidentiality or concern over data protection, Charles Franks should be informed immediately. Charles Franks is responsible for reviewing data protection procedures and related policies in line with the TMAL's agreed schedule. Charles Franks will arrange data protection training and advice for all TMAL staff.

Information Commissioners Office (ICO) Contact details

Tel: 0303 123 1113

Email: <https://ico.org.uk/global/contact-us/email/>

Address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

3. Trinity Money Advice Leicester workplace safety

As one of the Holy Trinity Leicester Compassion Ministries and being sited within Holy Trinity property (Trinity hall, 7, Trinity Lane, LE1 6WP). TMAL is subject to Holy Trinity's Health and Safety and Adult Safeguarding policies. Within that it is the intent of TMAL and Holy Trinity Leicester to provide a safe environment for all clients and volunteers. It is also our intent to properly manage any incidents that occur so as to minimise injury and other forms of loss. A

well-managed workplace safety programme benefits our organisation and its people in countless ways.

TMAL is committed to ensuring the physical safety of staff and clients within the advice centre environment. However due to the stressful situations clients may find themselves in TMAL staff may experience hostilities from clients such as physical and verbal assaults, threats, coercion and intimidation, which all constitute acts of violence.

In the Event of an Act of Violence TMAL staff will:

- look to try and defuse the person's anger so that he/she can cool down and talk calmly and rationally.
- maintain composure.
- try to signal for help from a co-adviser who can contact management, security, the police or paramedics.
- listen attentively. Hostile individuals who feel that they have your attention are sometimes less likely to act out physically.
- maintain eye contact which should help to calm the person down because the individual feels that he/she has attention.
- be courteous and patient until help arrives.
- follow the client's instructions and stall for time if the client has a weapon.
- never try to intercept the weapon or act aggressively against the individual.
- retain the right to terminate any advice/employment forthwith.

TMAL staff will talk to the Centre Manager immediately if they observe unusual behaviour in others, feel intimidated, or have any concerns. These concerns will be discussed and recorded in TMAL's incident book.

Centre Manager name: Date:

Centre Manager contact details: contact@trinitymoneyadvice.org.uk or 0116 319 2636

TRINITY MONEY ADVICE LEICESTER

HEALTH & SAFETY POLICY (This policy will be reviewed if circumstances change and on a regular basis according to TMAL's review schedule)

This is the statement of general policy and arrangements for:		TRINITY MONEY ADVICE LEICESTER
(Name of centre manager manager) CHARLES FRANKS		has overall and final responsibility for health and safety
(Member of staff)		has day-to-day responsibility for ensuring this policy is put into practice
Statement of general policy	Responsibility of: Name/Title	Action/Arrangements (What are you going to do?)
Prevent accidents and cases of work-related ill health by managing the health and safety risks in the centre		
Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work		
Engage and consult with staff on regular health and safety conditions		
Implement emergency procedures - evacuation in case of fire or other significant incident. You can find help with your fire risk assessment at: https://www.gov.uk/workplace-fire-safety-your-responsibilities		
Maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage/use of substances		

Signed: * (centre manager)		Date:	
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Health and safety law poster is displayed at (location)	
First-aid box is located	

