Information Governance Policy and Procedures
(Easy Read)

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Preface: The charity's Key Policies

This document is intended to provide essential information on some of our core policies in a format that is easy to read for people with limited literacy skills or poor eyesight, across all of the areas in which innercycle and Chikama Trust provides services.

It is important that all of our personnel are sensitive to people's different levels of literacy and eyesight when using these guidelines. Some individuals will be able to read through and understand these guidelines on their own, other will need much more support from our team. Some individuals will find it very difficult to take in this information in any form.

Standard versions of any of the charity's policies are available on request.

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1. Policy Statement

What does the policy say?

The policy explains how innercycle and Chikama Trust personnel will store and use personal information about you

Why is it necessary?

It is necessary because we have to act in accordance with the Data Protection Act 1998 and the forthcoming GDP Regulations, to ensure that we deliver a high quality service to you and keep your information safe

2. Scope of Policy

What does the policy cover?

The policy is for you to understand how information about you will be kept in your files, and what rights you have regarding your files

3. Aims and Objectives

- The aim of this policy is to make sure that you know what innercycle and Chikama Trust will do to keep your personal information safe
- To help you to understand why we might tell other people things about you, and when we might need to do this even if you don't want us to
- This will help us to be able to protect your rights to privacy and reduce the risk of harm against you

4. Definition

What is personal information?

Personal information means any information or details about you that is available to innercycle and the trading arm, Chikama Trust.

Examples:

- Notes we make about and during contact with you
- Personal Information
- Addresses

5. Responsibilities

Who is responsible for putting the policy into place?

Staff (including outsourced contracted personnel):

- All staff are responsible for understanding the policy and the Data Protection Act
- Staff are responsible for making sure your files are kept secure, accurate and up to date and are safely destroyed when no longer needed
- Staff are responsible for making sure that only information that has something to do with the service we give you is kept in your files

- Staff must make sure that you are supported in a sensitive way if you want you look at or gain a copy of your personal files

Line managers:

- Line managers will advise our personnel on how to support you when you want to see your files.

6. Consent for us to keep information about you

To access services, there are consent forms that you should sign before we can use or share information about you. The request for release of information will have to be made to our Records Office via: support@innercycle.org

When asked to sign a consent form we must tell you the following:

- Why we need to get personal information from you
- What we are planning to do with the information
- That the information may be shared with other staff that work with you
- We will tell you how your information is stored and kept
- When you leave the service, your information will be kept for a set period and then destroyed

- You can give us the name of another person, such as a family member, friend, guardian or advocate, who you don't mind us sharing information with

- We might have to break your confidentiality when absolutely necessary

- Most of the time you have the right to stop us from sharing your confidential information

What if you don't want us to keep your information?

- You might not want the charity to keep information about you

- If you don't want to share information with us then we might not be able to offer a good standard of service or any service at all

If you are unable to give consent:

- If you have been assessed under the Mental Capacity Act 2005 as not been able to give consent, then we should ask an independent advocate (a person who pleads for a cause) or someone close to you to sign on your behalf

Children and young people

- We do not provide services for children (minors). We must get consent from a young person's parent or guardian before we can use information

- If you are 16-18 years old you are old enough to consent for yourself

7. Your rights to see your files

- The law says that you have the right to access the information we keep about you
- If you have a question about the information in your files, you can ask any member of staff but asking your therapist should be the first step
- If you want to see all the information we have about you, you will need to tell us in writing. It can take us up to thirty days to find all the information we have about you

When can access to your information be refused?

- We might need to refuse to let you see some information to protect the privacy of another person
- There might be some information in your file that could seriously upset you and a doctor may decide that they don't want you to see this information
- When we are unable to give you access to all your information, we will provide you with as much information as possible

What if you disagree with the information?

- If you disagree with the information in your file because you feel it is not accurate or unfair, you can ask to have it changed or ask staff to add your comments to the file

What if you don't want the charity to hold your information any more?

- The law says that you have some rights to ask innercycle and Chikama Trust to stop collecting and storing information about you if you use our charity services
- You must show that storing information about you is causing you a lot of distress before we can stop collecting information about you. This might mean that we can't give you the same support as before

8. Giving other people information about you

We might have to share your information with other service providers that also deal with your support. For example, a doctor, social worker or someone is helping you with housing. We will always tell you about this unless someone is going to be harmed or is at risk.

9. How we will keep your information safe

- Staff must keep all your information in a safe place to ensure that other people don't have access to it
- Staff must destroy your personal information when they don't need it any more
- If your information is kept on a computer, then it must be protected with a password
- You can ask to have your files stored in another place

- Staff must get permission from their line manager if they want to remove any physical files from an office. They will have to sign in a book when taking your files out and also when they are returned
- Files must be transported in lockable boxes
- Electronic files are created, administered and stored in secure systems with two-factor authentication access and only those with 'user permission' rights may access your information. They are held in the 'cloud' securely and no staff may download them to a personal device. In certain instances, your information is anonymised (no one can identity you from the records).
- If anyone sees your information without a good reason, it is a serious matter and must be reported by staff
- You have a right to complain to us if your information isn't kept safe

Closed Circuit Television Pictures

We do not currently operate any CCTV cameras. If we do, we must:

- Make sure we have good reasons for using CCTV
- Put signs up to say that there are CCTV cameras
- Not keep CCTV footage or images for longer than necessary and they must be erased afterwards
- Only permit footage or images to be looked at by people who have a good reason to see them

10. What happens to your information when you leave?

- We need to hold on to your information for a period of time after you stop using our services in case you need the charity's support again or if there are other matters that aren't sorted out yet
- When you no longer use the charity's service, your files will be locked in a safe place
- In most cases, files will be kept for 8 years.
- After a set period of time, files will be destroyed/deleted.

11. How we make sure your information is useful and correct

We will make sure that your information is kept in the following way:

- Accurate
- Up to date
- Not judging you
- It will be part of your individual support plan
- It will be written in a way that is easy to understand