



BULGARIA MEDICAL TRAVEL PARTNER LTD

Confidentiality Policy

1. General principles

Bulgaria Medical Travel Partner LTD recognises that colleagues (employees, volunteers, students, apprentices, trustees & others who work within our organisation) gain information about individuals and organisations during the course of their work or activities. In the case of health-related information, it is classified as confidential sensitive information and is collected, processed and stored according to instruction from Article 23, section 4 from the Data Protection Law for processing personal data and its protection from illegal way of processing at the register “Clients” of the Bulgaria Medical Travel Partner LTD, which instruction is presented at the Data Protection Policy. In the remaining cases, most of the time the information collected will not be stated as confidential and colleagues may have to exercise common sense and discretion in identifying whether information is expected to be confidential.

This policy aims to give guidance but if in doubt, seek advice from your line manager.

- 1.1. Information received by Bulgaria Medical Travel Partner LTD, as part of the services it provides, will be considered to be information for Bulgaria Medical Travel Partner LTD to share with colleagues and use to deliver its aims and objectives.
- 1.2. Colleagues should inform groups, organisations or individuals why they are requesting information and explain the purpose of storing and using this information. Colleagues should ask permission to keep and use this information
- 1.3. Colleagues are able to share information with their line manager in order to discuss issues and seek advice. Colleagues will not disclose to anyone, other than their line manager, any information considered sensitive, personal, financial or private without the knowledge or consent of the individual, or an officer, in the case of an organisation
- 1.4. Colleagues should avoid exchanging personal information or comments (gossip) about individuals with whom they have a professional relationship.
- 1.5. Colleagues should avoid talking about organisations or individuals in social settings.
- 1.6. There may be circumstances where colleagues would want to discuss difficult situations with each other to gain a wider perspective on how to approach a problem.



- 1.7. If colleagues receive information from individuals outside Bulgaria Medical Travel Partner LTD regarding the conduct of a colleague or group, then this should be dealt with sensitively. The appropriate colleague should tell the individual about the Complaint Procedure and advise them accordingly.
- 1.8. If employees are dissatisfied with the conduct of a colleague, and have sensitive information that could be evidenced through investigation, they should discuss it with the appropriate line manager under the Whistle Blowing Procedure. Any allegation, which is found to be malicious, or ill-founded, will be dealt with by Bulgaria Medical Travel Partner LTD under the Disciplinary Procedure.
- 1.9. Where there is a legal duty on Bulgaria Medical Travel Partner LTD to disclose information, the person that is affected will be informed that disclosure has or will be made.

2. Why information is held

- 2.1. Most information held by Bulgaria Medical Travel Partner LTD relates to Individuals or service users, members, employees, trustees, and volunteers.
- 2.2. Information is kept to enable Bulgaria Medical Travel Partner LTD colleagues to understand the needs of individuals or service users in order to deliver the most appropriate services.
- 2.3. Information about users may be kept for the purposes of monitoring our equal opportunities policy and also for reporting back to funders.

3. Access to information

- 3.1. Information is confidential to Bulgaria Medical Travel Partner LTD as an organisation and may be passed to colleagues, line managers or trustees to ensure the best quality service for users.
- 3.2. Where information is sensitive, i.e. it involves disputes or legal issues, it will be confidential to the employee dealing with the case and their line manager. Such information should be clearly labelled 'Confidential' and should state the names of the colleagues entitled to access the information and the name of the individual or group who may request access to the information.
- 3.3. Colleagues will not withhold information from their line manager unless it is purely personal to them and not business related.
- 3.4. Users may see Bulgaria Medical Travel Partner LTD records which relate to them or their organisation. The request must be in writing to the Managing Director giving 14 days' notice. The letter must be signed by the individual, or in the case of an organisation's records, by the Managing Director.
- 3.5. Sensitive information as outlined in point 3.2 will only be made available to the person or organisation named on the file.



- 3.6. Employees may see their personnel records by giving 14 days' notice in writing to the Managing Director.
- 3.7. When photocopying or working on confidential documents, colleagues must ensure they are not seen by people in passing. This also applies to information on computer screens.

4. Storing information

- 4.1. General non-confidential information about organisations is kept in unlocked filing cabinets that are available to all Bulgaria Medical Travel Partner LTD colleagues.
- 4.2. Information about volunteers, interns and other individuals will be kept in filing cabinets by the colleague directly responsible. Colleagues must ensure line managers know how to gain access.
- 4.3. Employees' personnel information will be kept in lockable filing cabinets by line managers and will be accessible to the Managing Director.
- 4.4. Files or filing cabinet drawers bearing confidential information should be labelled 'confidential'.
- 4.5. In an emergency situation, the Managing Director may authorise access to files by other people.
- 4.6. Ensure confidential documentation or personal data is shredded before putting in the recycling bins.

5. Duty to disclose information

- 5.1. Bulgaria Medical Travel Partner LTD has a legal duty to disclose some information including:
 - 5.1.1. Child abuse will be reported to the Children's Services / Social Services Department
 - 5.1.2. Drug trafficking, money laundering, acts of terrorism or treason will be disclosed to the police.
- 5.2. In addition colleagues believing an illegal act has taken place, or that a user is at risk of harming themselves or others, must report this to the Director who will report it to the appropriate authorities.
- 5.3. Bulgaria Medical Travel Partner LTD should inform the users of this disclosure.

6. Disclosures



- 6.1. Bulgaria Medical Travel Partner LTD complies fully with the Data Protection Law from 2002 regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.
- 6.1. Bulgaria Medical Travel Partner LTD will request pre-employment Disclosure and Barring Service checks for new employees and volunteers whose posts involve contact with vulnerable children or adults, as specified by the Disclosure Section.
- 6.1. Bulgaria Medical Travel Partner LTD will clearly state the need for, and level of, Disclosure on the recruitment advert.
- 6.1. Disclosure information is always kept separately from an applicant's personnel file in secure storage with access limited to those who are entitled to see it as part of their duties. It is a criminal offence to pass this information to anyone who is not entitled to receive it.
- 6.1. Documents will be kept for a year and then destroyed by secure means. Photocopies will not be kept. However, Bulgaria Medical Travel Partner LTD may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, and the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

7. Data Protection Act

- 7.1. Information about individuals, whether on computer or on paper, falls within the scope of the Data Protection Act and must comply with the data protection principles.

These are that personal data must be:

- Obtained and processed fairly and lawfully
- Held only for specified purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept longer than necessary
- Processed in accordance with the Act
- Kept secure and protected
- Not transferred out of Europe

- 7.2. Bulgaria Medical Travel Partner LTD will ensure that it complies with all aspects of the Data Protection Act. Please refer to Bulgaria Medical Travel Partner LTD Data Protection Policy for detailed information on how we will do this.

8. Breach of confidentiality



- 8.1. Colleagues who are dissatisfied with the conduct or actions of other colleagues or Bulgaria Medical Travel Partner LTD should raise this with their line manager using the grievance procedure, if necessary, and not discuss their dissatisfaction outside Bulgaria Medical Travel Partner LTD.
- 8.2. Colleagues accessing unauthorised files or breaching confidentiality may face disciplinary action. Ex-employees breaching confidentiality may face legal action.

9. Whistleblowing

- 9.1. Any colleagues who have concerns about the use of Bulgaria Medical Travel Partner LTD funds, or any practice by any employee must comply with the requirements of the Whistle Blowing Policy.

Signed

Vesselina Iv. Dimova
Managing Director

Date: 7th November 2016