



WEST LIMERICK INDEPENDENT LIVING CLG

Confidentiality and Information Sharing Policy

Policy Reference	WLILP47
Category	Operational Policies — Data Protection
Version	3.0 (IT security/disaster recovery references resolved)
Status	APPROVED — by the Board of Directors on 9 October 2026
Supersedes	WLILP47 - Confidentiality and Information Sharing Policy - DRAFT v2.0; Confidentiality and Information Sharing Policy (April 2026, separately produced)
Policy Owner	Board of Directors, West Limerick Independent Living CLG
Applies To	All employees, including Personal Assistants, Service Coordinators, administrative staff, and management
Related Policies	WLILP7A - Data Protection Policy; WLILP7B - Data Breach Response Policy; WLILP7C - Data Access Policy; WLILP7D - Data Retention, Rectification and Erasure Policy; WLILP29 - Information Systems and Cloud Access Control Policy; WLILP46 - Records Management Policy
Review Cycle	Regularly, or in line with legislative or operational changes

1. Purpose

The purpose of this policy is to ensure that West Limerick Independent Living (WLIL) protects the confidentiality, privacy, and personal information of people using its services, while enabling appropriate information sharing to support safe, effective, and person-centred service delivery.

This policy reflects WLIL's commitment to the principles of independent living, where individuals retain control over their personal information and decisions, supported by staff in a respectful and professional manner.

2. Scope

This policy applies to:

1. All employees, including Personal Assistants (PAs), Service Coordinators, administrative staff, and management



2. All information relating to people using the service, whether held in paper, electronic, or verbal form
3. All service users, including adults with disabilities
4. All environments where services are delivered, including private homes, community settings, and offices

3. Service Model and Ethos

WLIL operates a **person-centred, independent living model** where:

1. The person using the service directs their support
2. The person retains control over decisions about their personal information wherever possible
3. Staff act in a supportive role and do not override the person's preferences unless required by law or safeguarding obligations

Confidentiality is central to maintaining trust, dignity, and autonomy within this model.

4. Legislative and Regulatory Framework

This policy is informed by:

- Data Protection Act 2018 and GDPR
- Health Act 2007 and associated regulations
- HIQA Guidance on Information Governance (2018)
- HIQA Draft National Standards for Home Support Services (2024)

5. Definition of Confidential Information

Confidential information includes any information that identifies or could identify a person, including:

1. Personal details (name, address, date of birth)
2. Health, disability, and care information
3. Care plans, assessments, and risk assessments
4. Family, social, or financial circumstances
5. Verbal information shared during service delivery
6. Information recorded on electronic systems

This is classified as **special category personal data**.

6. Principles of Confidentiality

WLIL is committed to the following principles:



6.1 Respect for Privacy and Dignity

Individuals have the right to privacy and control over their personal information.

6.2 Need-to-Know Basis

Information is only shared with those who require it to deliver safe and effective support.

6.3 Transparency

Individuals are informed about:

- What information is collected
- Why it is collected
- How it is used
- Who it may be shared with

6.4 Security

All information is protected against unauthorised access, loss, or disclosure.

6.5 Client Control

Where possible, individuals decide how and with whom their information is shared.

7. Consent and Decision-Making

1. Consent must be obtained before sharing personal information, except where legal or safeguarding obligations apply
2. Consent decisions must be clearly recorded in the individual's care records
3. Where a person has reduced decision-making capacity:
 - o Supported decision-making principles apply
 - o The least restrictive approach is used
 - o Decisions are made in line with the person's will and preferences as far as possible

8. Information Sharing Without Consent

Information may be shared without consent only where:

1. There is a risk of serious harm to the individual or others
2. There is a safeguarding concern involving a child or vulnerable adult
3. It is required by law or court order
4. It is required for inspection, regulation, or investigation

In all cases:

- Only the minimum necessary information is shared



- The reason for sharing is documented

9. Staff Responsibilities

All staff must:

1. Maintain confidentiality at all times
2. Only access information necessary for their role
3. Not disclose information to unauthorised persons
4. Follow all procedures relating to data protection and information handling
5. Report any concerns or breaches immediately

Personal Assistants (PAs)

Due to the nature of their role in private homes, PAs must:

- Respect the client's privacy within their home environment
- Not discuss client information with family members or others unless authorised
- Be mindful of conversations that may be overheard
- Follow the client's preferences regarding information sharing where appropriate

10. Communication and Practical Guidance

10.1 Verbal Communication

- Avoid discussing confidential information in public or shared spaces
- Confirm identity before sharing information over the phone
- Do not discuss sensitive information casually or informally

10.2 Family and Representatives

- Information may only be shared where:
 - The client has given consent, or
 - There is a legal or safeguarding basis

10.3 External Professionals

- Information sharing must be appropriate, relevant, and documented

11. Use of Digital Systems and Devices

WLIL uses electronic systems to manage information securely.

Staff must:

1. Use approved systems (e.g. Care Planner, Office 365) only



2. Keep login details secure and not share passwords
3. Ensure devices are locked when not in use
4. Not store confidential information on personal devices
5. Not use personal messaging apps (e.g. WhatsApp) for sharing client information

12. Information Storage and Security

1. Paper records are stored securely with restricted access
2. Electronic records are password-protected and access-controlled
3. Information is retained and disposed of in line with WLIL retention policies
4. Confidential information must not be removed from secure systems without authorisation

13. Breach of Confidentiality

13.1 Definition

A breach includes:

- Unauthorised disclosure
- Loss of information
- Access by unauthorised persons

13.2 Reporting

All breaches must be reported immediately to:

- The Service Coordinator or Manager

13.3 Response

WLIL will:

1. Assess the risk
2. Take immediate action to contain the breach
3. Document the incident
4. Notify relevant authorities where required
5. Implement corrective actions

14. Training and Awareness

1. All staff receive confidentiality and data protection training as part of induction
2. Refresher training is provided regularly
3. Staff are expected to remain aware of their responsibilities at all times



15. Monitoring and Review

1. Compliance with this policy is monitored through:
 - o Supervision
 - o Audits
 - o Incident reviews
2. This policy will be reviewed regularly or in line with legislative or operational changes

16. Practical Examples (Guidance for Staff)

Example 1: A family member asks about the client's condition → Do not share information unless consent is confirmed	Example 2: A hospital contacts a PA → Refer to the Service Coordinator unless authorised
Example 3: A client shares sensitive personal information → Record appropriately and respect confidentiality	Example 4: Staff discussing a client in a public place → This is not permitted

17. Data Protection and Information Governance

Confidentiality and information sharing within West Limerick Independent Living (WLIL) operate as part of a wider data protection and information governance framework.

WLIL processes personal and special category data in line with its obligations under the Data Protection Act 2018 and GDPR. All handling of personal data is governed by WLILP7A - Data Protection Policy, which sets out the organisation's overall approach to lawful processing, data security, accountability, and individual rights.

This Confidentiality and Information Sharing Policy should be read in conjunction with the following key policies:

- **WLILP7A - Data Protection Policy (overall governance and lawful processing)**
- **WLILP7B - Data Breach Response Policy (management and reporting of data breaches)**
- **WLILP7C - Data Access Policy (individual rights of access to personal data)**
- **WLILP7D - Data Retention, Rectification and Erasure Policy (retention and disposal of data)**
- **WLILP29 - Information Systems Access Policy (access control and system security)**



- **WLILP46 - Records Management Policy** (creation, storage, and management of records)
- **WLILP29 - Information Systems and Cloud Access Control Policy (covers Microsoft 365/Office 365 security specifically); WLILP60 - IT Disaster Recovery Policy**

All staff must understand that:

1. Confidentiality is one part of a broader legal and governance framework
2. Access to, use of, and sharing of information must comply with all related policies
3. Any uncertainty regarding data protection or information sharing must be referred to management or the Data Protection Officer

Failure to adhere to these requirements may result in disciplinary action and, where applicable, regulatory reporting.

Final Note

This policy supports WLIL's commitment to:

- Independent living
- Respect for individual autonomy
- Safe and professional service delivery

All staff are expected to apply this policy in their daily work and uphold the trust placed in the organisation by those it supports.

Approval

Approved by the Board of West Limerick Independent Living CLG on 9 October 2026.

Signed on behalf of the Board, on its instruction, by the General Manager:

Margaret O'Brien O'Connor, General Manager

Date signed: 09-10-2026