

PROJECT PROMETHEUS C.I.C.

POLICY FRAMEWORK PACK

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TABLE OF CONTENTS

1. Safeguarding Policy
2. Equality & Diversity Policy
3. Quality Assurance Policy
4. Data Protection Policy (GDPR)
5. Confidentiality & Information Handling Policy

Safeguarding Policy

Project Prometheus C.I.C.

1. Introduction

Safeguarding within Project Prometheus C.I.C. refers to the actions taken to protect participants, guardians, family members, staff, volunteers and partners from harm during the delivery of Guardian Check. Unlike programmes that focus solely on psychological or clinical harm, Guardian Check recognises the role of **financial destabilisation, household disruption and relapse-driven risk** as safeguarding concerns. Gambling addiction frequently produces patterns of secrecy, compulsive access to funds, deterioration of family relationships, debt escalation and, in severe cases, loss of housing and mental health crisis. Safeguarding within this context therefore requires a broader interpretation that includes financial and relational risk rather than solely physical or sexual harm.

2. Purpose of the Policy

The purpose of this policy is to establish a coherent safeguarding framework that allows Project Prometheus to identify, prevent, mitigate and respond to harm arising from gambling addiction. The policy sets out how concerns are recognised, how they are escalated, and how information is shared lawfully and proportionately. This includes the responsibilities of staff, volunteers, guardians and external partners in maintaining participant and household safety.

3. Scope of Application

This policy applies to all individuals engaged with Guardian Check, including participants, guardians (generally family members or partners), staff, volunteers, contractors, Board members and delivery partners. It applies to both remote and in-person interactions, including digital check-ins, assessments, financial reviews, household coordination and crisis escalation. The policy is also relevant to multi-agency collaboration with health, social care, debt advice services and emergency services.

4. Safeguarding in the Context of Gambling Addiction

Traditional safeguarding frameworks emphasise physical, sexual or domestic abuse. Project Prometheus acknowledges these risks but adds an additional category: **financial harm as a primary driver of household destabilisation**. Gambling addiction can result in unauthorised spending, debt accumulation, hidden loans, use of credit lines, disruption of essential bill payments, and depletion of savings intended for dependants. Financial harm is often accompanied by shame, secrecy and deterioration of trust within the household. When unmanaged, these factors can escalate to mental health crisis, family conflict, housing insecurity and risk behaviours. Guardian Check is designed to interrupt these risk trajectories through external financial oversight and structured support.

5. Roles and Responsibilities

The Board of Directors holds accountability for safeguarding compliance, policy review and response to serious incidents. The Project Manager is responsible for operational safeguarding, reporting and coordination. The Clinical Director provides oversight for cases involving mental health crisis, suicide risk or multi-agency referrals. Guardians assist in protecting household finances and reducing relapse opportunity. All staff and volunteers must identify and report safeguarding concerns promptly. Participants are expected to engage honestly with the programme and inform staff of emerging issues affecting safety or access to funds.

6. Recognising Safeguarding Concerns

Safeguarding concerns may arise in several forms, including but not limited to:

- relapse accompanied by uncontrolled access to money
- rapid depletion of household funds
- unauthorised use of credit or loans
- disruption of essential bill payments (e.g. rent, utilities, food)
- manipulation or coercion within financial relationships
- mental health crisis triggered by financial or gambling pressures
- risk to dependants due to loss of resources
- housing instability or eviction risk
- self-neglect or suicidal ideation
- domestic conflict linked to financial strain

Concerns may be disclosed directly by participants or guardians, identified during check-ins, or observed through behavioural or financial patterns.

7. Assessment and Screening

All participants undergo an initial assessment at intake. This assessment considers gambling patterns, relapse triggers, financial exposure, household structure, mental health context, and protective factors. The assessment enables the organisation to determine the level of support required and the appropriate check-in schedule. Assessments are repeated periodically to detect changes over time.

8. Check-In Structure and Monitoring

Guardian Check operates through progressive stabilisation phases. Early phases may involve daily or weekly check-ins to reduce relapse likelihood and establish financial continuity. As participants stabilise, check-ins may transition to fortnightly or monthly intervals. Monitoring focuses on relapse behaviour, access to funds, bill payments, household functioning, and mental health indicators without providing clinical diagnosis.

9. Financial Safeguarding (FIGS)

Financial harm is a primary mechanism of deterioration in gambling addiction and therefore constitutes a safeguarding domain within Guardian Check. The Financial Guardian System (FIGS) restricts access to funds, ensures continuity of essential bill payments and prevents relapse-driven financial depletion. Guardians (typically spouses or family members) may

hold temporary control of bank accounts, spending thresholds or disbursements, depending on assessed risk. FIGS does not provide financial advice or debt restructuring, but functions to prevent acute financial collapse and household instability. Financial safeguarding concerns may include unauthorised spending, hidden borrowing, depletion of rent or food budgets, loss of income, or disruption of essential payments. Where appropriate, participants may be referred to debt advice services, benefits support or housing services. All financial safeguarding actions must be proportionate, time-limited, consent-based wherever possible, and supported by clear documentation.

10. Suicide & Crisis Response

Project Prometheus maintains a defined protocol for responding to suicide risk, self-harm disclosures and acute mental health crisis. Staff and volunteers do not provide clinical diagnosis, but must recognise indicators of crisis and respond in a structured and proportionate way. Where a participant expresses suicidal ideation, intent, planning, or where there is credible concern for self-harm or harm to others, the safeguarding duty overrides confidentiality. Immediate escalation may include contacting NHS crisis services, the participant's GP, local mental health teams, or emergency services (999) where there is imminent risk to life. Crisis involving dependants may trigger contact with social care under statutory obligations. Guardians may be informed when necessary to ensure household safety, unless this increases risk. All crisis incidents must be recorded contemporaneously, including evidence of risk, decision-making rationale and actions taken.

11. Vulnerable Adults and Duty of Care

Project Prometheus recognises a statutory and ethical duty of care towards vulnerable adults participating in Guardian Check. A vulnerable adult is defined as any individual aged 16 or over who, due to illness, mental health condition, disability, addiction, financial dependence, coercive control, or domestic circumstances, may be unable to protect themselves from harm, exploitation, neglect or abuse. Vulnerability in the context of gambling addiction frequently arises from financial instability, rapid access to credit, dependency on partners or family members, loss of income, housing risk, or deterioration in mental health. Vulnerability may be transient, situational, or chronic, and does not require a clinical diagnosis to activate duty of care.

The organisation has an obligation to identify vulnerability, assess the context in which it appears, and implement proportionate measures to reduce risk. These measures may include adjustments to support plans, referral to appropriate services, involvement of guardians, or escalation to statutory agencies when required. Guardians are not a substitute for statutory protection and may themselves be vulnerable; staff must avoid assumptions of capacity or safety within the household. Where concerns relate to coercion, dependency, domestic abuse, or exploitation, the organisation may withhold household disclosure until risk has been assessed.

Duty of care may involve signposting or referral to NHS mental health services, social care, debt advice, housing support, adult protection teams, or emergency services. Information sharing follows a "necessary and proportionate" principle and aligns with the Confidentiality & Information Handling and Data Protection (GDPR) policies. Vulnerable adult concerns must be documented, time-stamped and reviewed by the Safeguarding Lead.

12. Escalation and Crisis Response

Safeguarding concerns are escalated proportionately according to severity. Financial safeguarding concerns may be escalated to guardians and, where appropriate, to debt, benefits, or housing support services. Mental health concerns may trigger referral to NHS mental health services or emergency services if there is risk to life or safety. In circumstances involving dependants, local authority social care may be contacted according to statutory duties. All escalation decisions must be documented, justified, and reviewed by the Safeguarding Lead.

13. Information Sharing and Confidentiality

Safeguarding sometimes requires information sharing between agencies. Information is shared on a **minimum necessary** basis, preserving dignity and privacy while protecting safety. All sharing complies with the **Confidentiality & Information Handling Policy** and the **Data Protection Policy (GDPR)**. Consent is sought wherever possible, but may be overridden where there is substantial risk of harm, legal obligation or risk to life.

14. Multi-Agency Collaboration

Complex safeguarding scenarios may require coordinated responses involving debt advice services, NHS services, local authorities, legal support, advocacy organisations or emergency services. Project Prometheus adopts a collaborative approach to ensure participants and families receive appropriate and timely support.

15. Internal Safeguarding for Lived-Experience Roles

The Project Manager role includes lived experience of gambling addiction. To prevent conflict of interest or self-risk, the organisation provides clinical oversight, Board supervision and defined boundaries around organisational finances. The Project Manager does not hold responsibility for organisational funds and must disclose relapses or incapacity affecting operational duties. Continuity arrangements ensure the programme can continue without disruption.

Where the Project Manager role is held by a lived-experience individual, the Board ensures appropriate clinical supervision, financial boundaries and contingency arrangements. asi?

16. Training and Awareness

All staff, volunteers and guardians receive safeguarding orientation, with refresher training delivered annually or in response to emerging risks or legislative changes. Training includes recognising financial safeguarding concerns, responding to disclosures, reporting processes, and understanding multi-agency protocols.

17. Recording and Documentation

Safeguarding incidents, disclosures, assessments, referrals and escalation actions must be recorded accurately, time-stamped and stored securely. Records are retained in accordance with the **Data Protection Policy (GDPR)** and organisational retention schedules.

18. Complaints and Whistleblowing

Individuals may raise concerns about safeguarding practices, decision-making or failures without fear of repercussion. Complaints are reviewed by the Board and may result in corrective action or policy revision.

19. Review of the Policy

This policy is reviewed annually or earlier if required by legislative changes, commissioning requirements or operational learning. The policy is approved by the Board and applies to all organisational functions.

Equality & Diversity Policy

Project Prometheus C.I.C.

1. Introduction

Project Prometheus C.I.C. is committed to promoting equality of opportunity and eliminating discrimination across all aspects of service delivery, governance, recruitment and community engagement. The organisation recognises that gambling addiction is not isolated to any single demographic group, and that its consequences frequently intersect with socioeconomic deprivation, family structures, mental health, ethnicity, gender and household financial systems. For this reason, the organisation adopts an inclusive and anti-discriminatory approach to ensure that individuals and families affected by gambling addiction can access appropriate support without stigma or barriers.

2. Legal and Policy Framework

This policy has been developed in accordance with the **Equality Act 2010**, which provides protection against discrimination on the basis of protected characteristics including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Although socioeconomic deprivation is not classified as a protected characteristic under UK law, Project Prometheus recognises its role in health inequalities and acknowledges that gambling-related harm is disproportionately concentrated among low-income households. This understanding informs service design, outreach and participation strategies.

3. Purpose of the Policy

The purpose of this policy is to ensure that equality and diversity principles are embedded in every stage of the organisation's work. This includes recruitment, training, service access, guardian engagement, data collection, evaluation, governance and external partnership working. The policy aims to ensure that no participant, guardian, staff member or volunteer experiences discrimination or exclusion on the basis of protected characteristics or socioeconomic status.

4. Commitment to Non-Discrimination

Project Prometheus does not tolerate discrimination, harassment or victimisation in any form. All individuals engaging with the organisation have the right to be treated fairly, respectfully and with dignity. Staff and volunteers are expected to uphold these standards, and the Board is responsible for ensuring adequate training, oversight and accountability mechanisms.

5. Inclusive Service Design

Guardian Check has been intentionally designed to reduce inequality in access. Key features include remote delivery, flexible scheduling, family involvement, lived-experience leadership and the absence of financial barriers for participants. These features collectively support individuals who may not be able to attend in-person services due to disability, caring responsibilities, work schedules, rural isolation or financial constraints.

6. Accessibility and Reasonable Adjustments

The organisation will make reasonable adjustments to enable participation for individuals with disabilities or additional needs. This may include alternative communication formats, extended time for assessments, involvement of guardians or advocates, and accommodations for mental health-related processing or participation barriers. Requests for adjustments are considered in good faith and implemented whenever practicable.

7. Recruitment and Governance

Staff and volunteer recruitment within Project Prometheus is based on merit and competence. The organisation recognises the value of lived experience and encourages applications from individuals who have experienced gambling addiction or related harms. Such experience is not considered a liability but a source of insight and credibility within the programme delivery model. The Board is responsible for oversight of recruitment fairness, equal opportunities and workforce composition.

8. Data, Monitoring and Evaluation

To ensure that services are both equitable and effective, the organisation may collect anonymised demographic data, participation metrics and outcome data. This information helps identify disparities in access or outcomes among different groups. All data handling

complies with the **Data Protection Policy (GDPR)** and the **Confidentiality & Information Handling Policy**.

9. Complaints and Feedback

Any individual who believes they have been discriminated against may raise a complaint without fear of retaliation. Complaints are reviewed by the Board and may trigger corrective actions, policy updates or training interventions. Feedback mechanisms remain accessible to participants, guardians, staff and volunteers.

10. Accountability and Review

The Board holds ultimate responsibility for ensuring the organisation complies with equality and diversity obligations. Training and policy reviews occur annually or in response to legislative changes. The policy is approved by the Board and applies to all organisational activities.

Quality Assurance Policy

Project Prometheus C.I.C.

1. Introduction

Quality assurance within Project Prometheus C.I.C. refers to the systems, standards and processes used to ensure that Guardian Check is delivered safely, consistently and effectively. The organisation recognises that gambling addiction is a chronic behavioural condition that destabilises households primarily through financial and relational mechanisms rather than through acute episodes alone. As such, quality cannot be measured merely through attendance or engagement metrics, but through meaningful outcomes including reduced relapse events, improved household stability, continuity of essential bill payments and reduced financial crisis. This policy sets out how the organisation defines quality, how it is monitored, and how it is improved over time.

2. Purpose

The purpose of this policy is to provide a framework for maintaining high standards of service delivery, safeguarding, data accuracy, record keeping, staff competence and participant support. The policy ensures that Guardian Check operates with accountability, transparency and continuous improvement, and that it is capable of meeting expectations set by commissioners, councils, NHS partners and regulatory bodies.

3. Quality in the Context of Gambling Addiction

Traditional treatment programmes often measure success through abstinence or reduced psychological distress. Project Prometheus adopts a broader household-centric definition. From this perspective, quality is measured by whether the participant and their household are protected from financial harm, whether relapse episodes are contained rather than catastrophic, whether debts stabilise or reduce, and whether trust between family members improves. These indicators more accurately reflect lived experience and household wellbeing than purely clinical or motivational measures.

4. Governance and Responsibility

The Board of Directors holds responsibility for quality assurance and oversees compliance with policies, audits and external evaluations. The Project Manager is responsible for operational implementation, monitoring and reporting. The Clinical Director provides oversight related to mental health crisis, multi-agency referrals and safeguarding concerns that may affect service quality. Staff, volunteers and guardians are expected to follow procedures, maintain accurate records and report concerns.

5. Service Design and Delivery

Guardian Check is delivered through structured phases tailored to participant risk and stability. Early phases involve intensive observation and financial containment, while later phases focus on maintenance, relapse prevention and progressive delegation of responsibility back to the participant and household. The structured approach ensures continuity of support and minimises disruption caused by relapse events, life stressors or financial setbacks. Delivery may occur remotely or in person, increasing accessibility for individuals with mobility, employment or caring responsibilities.

6. Assessment and Monitoring

Participants undergo an intake assessment covering gambling patterns, financial exposure, debt, household structure, mental health context and relapse triggers. This assessment informs the support plan, including check-in frequency and guardian involvement. Monitoring includes financial indicators such as bill payment continuity, controlled access to funds, debt trajectory and relapse containment. Monitoring does not constitute clinical diagnosis or financial advice, but operational supervision intended to protect households.

7. Participant Outcomes

Quality is evaluated through both quantitative and qualitative indicators. Quantitative indicators may include reduced relapse events, debt stabilisation, reduced high-risk access to funds, improved rent and utility payment continuity, and retention rates within the programme. Qualitative indicators include household perceptions of stability, trust, dignity and reduced fear of financial collapse. External evaluations and case studies may be used to supplement outcome reporting without compromising participant dignity.

8. Data Collection and Records

Accurate and reliable records underpin quality assurance. Staff and volunteers must record assessments, check-ins, escalation decisions, referrals and significant household financial changes. Records must be detailed enough to enable accountability, and stored securely in accordance with the **Data Protection Policy (GDPR)** and the **Confidentiality & Information Handling Policy**.

9. Multi-Agency Coordination

Project Prometheus collaborates with mental health services, debt advice organisations, NHS services, social care, housing services and emergency services when appropriate. Quality is enhanced when participants receive coordinated intervention rather than fragmented support. The organisation seeks to build cooperative relationships with relevant agencies to ensure timely and appropriate referral pathways.

10. Evaluation and Audit

Internal audits occur at defined intervals to assess adherence to policies, data accuracy, safeguarding compliance and service consistency. External evaluation may be commissioned to provide independent assessment of programme effectiveness. Evaluation processes may include participant surveys, guardian feedback, case reviews, service mapping and comparative outcome analysis.

11. Complaints and Feedback

Complaints are viewed as opportunities for improvement rather than confrontation. Participants, guardians, staff and volunteers may raise concerns about service quality, communication or decision-making without fear of reprisal. The organisation investigates complaints fairly and may implement corrective actions such as staff training, process adjustments or policy updates.

12. Continuous Improvement

Project Prometheus is committed to continuous improvement. Policy reviews, staff training, outcome evaluations, participant feedback and operational learning all contribute to service enhancement. The organisation recognises that gambling addiction is an evolving field, and retains flexibility to adopt new evidence-based practices or service innovations that benefit participants and households.

13. Review of the Policy

This policy is reviewed annually or earlier in response to legislative changes, commissioning requirements or operational learning. The policy is approved by the Board and applies to all organisational activities.

Data Protection Policy (GDPR)

Project Prometheus C.I.C.

1. Introduction

Project Prometheus C.I.C. processes personal data for the purposes of delivering Guardian Check, coordinating household financial safeguarding, engaging with guardians, supporting crisis escalation, and contributing to evaluation and commissioning requirements. The organisation recognises its obligations as a Data Controller under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, and is committed to ensuring that personal data is handled lawfully, fairly and transparently. This policy explains how data is collected, stored, shared and retained, and outlines the rights of data subjects.

2. Purpose of the Policy

The purpose of this policy is to establish a clear and comprehensive framework for the lawful processing of personal and special category data within Project Prometheus. It ensures that the organisation meets regulatory expectations, protects participants and guardians from misuse of information, and provides commissioners and oversight bodies with confidence that data handling practices meet current standards.

3. Scope of Application

This policy applies to all personal data processed by the organisation, including participant, guardian, staff, volunteer, contractor and Board member information. It covers data collected through digital intake, check-ins, household assessments, crisis escalations, multi-agency referrals, evaluation activities and administrative functions. The policy applies to both automated and manual processing activities, irrespective of format.

4. Definitions

Personal data refers to information relating to an identifiable individual. Special category data refers to information that requires additional safeguards due to its sensitivity, including data relating to health, mental health, addiction, ethnicity, religion or sexual orientation.

Processing refers to any operation performed on data, including collection, storage, analysis, sharing or destruction. A Data Controller determines the purposes and means of data processing; Project Prometheus fulfils this role.

5. Lawful Basis for Processing

Project Prometheus processes data under several lawful bases set out in Article 6 of the UK GDPR, including consent, contract, legal obligation, public interest and legitimate interests. Consent applies to participation in the programme and sharing information with guardians or

referral partners. Contract applies to the delivery of defined services. Legal obligations apply in the context of safeguarding and information disclosures. Public interest and legitimate interests apply to harm reduction, evaluation and commissioning activities. These lawful bases are recorded and reviewed to ensure they remain valid.

6. Processing of Special Category Data

The organisation may process special category data in connection with gambling addiction, mental health context and financial harm. Processing is justified under Article 9 of the UK GDPR on the grounds of explicit consent and substantial public interest. Project Prometheus does not provide clinical diagnosis, but may handle health-related information in connection with crisis escalation, referral pathways or safeguarding. Special category data is handled with enhanced security measures and restricted access.

7. Consent and Withdrawal

Consent is obtained prior to collecting personal data for participation in Guardian Check. Consent must be informed, specific and freely given. Participants and guardians may withdraw consent at any time without detriment. Withdrawal may affect the organisation's ability to deliver certain aspects of the programme, particularly those involving multi-agency work or guardian coordination. Withdrawal decisions are recorded and acknowledged.

8. Transparency and Privacy Information

Participants and guardians receive information explaining what data is collected, why it is collected, how it is used, with whom it may be shared, how long it is retained and what rights they have. This information is provided through privacy notices, intake materials and referral documents. Transparency enhances trust and supports informed participation.

9. Data Minimisation and Purpose Limitation

Project Prometheus collects only the data necessary to fulfil legitimate operational and safeguarding functions. Data is not collected for speculative or intrusive purposes, and is not used in ways that are incompatible with its original purpose. The organisation does not sell data or use it for marketing.

10. Data Storage and Security

Personal data is stored securely and protected against unauthorised access, alteration, disclosure or destruction. Access is restricted to staff and volunteers with operational need. Devices and systems used for processing data must be password-protected and comply with organisational security standards. Physical files, where used, must be stored in locked cabinets with controlled access.

11. Information Sharing and Multi-Agency Collaboration

Information may be shared with external agencies when necessary to protect participants, households or dependants. Examples include referrals to NHS mental health services, debt advice organisations, social care or emergency services. Information shared for evaluation or commissioning purposes is anonymised wherever possible. Where non-anonymised data must be shared, lawful basis must be demonstrated and recorded.

12. Participant Rights

Under the UK GDPR, data subjects have rights including access, rectification, erasure, restriction, objection and data portability. Participants may submit a **Subject Access Request (SAR)** to view data held about them. Requests are acknowledged and processed within statutory timelines, typically one calendar month.

13. Data Breach Management

A personal data breach refers to any incident resulting in unauthorised access, loss, disclosure or alteration of personal data. Project Prometheus assesses breaches promptly and determines whether notification to the Information Commissioner's Office (ICO) or data subjects is required. Breaches involving safeguarding, special category data or high-risk exposure are handled with priority.

14. Retention and Disposal

Data is retained only for as long as necessary to fulfil operational and legal requirements. Retention periods consider safeguarding, evaluation, financial audit, commissioning and participant rights. At the end of the retention period, data is securely destroyed or anonymised.

15. Training and Compliance

Staff and volunteers receive training on GDPR, confidentiality and safeguarding. Training is refreshed periodically and updated when legislation changes. Compliance is monitored through internal audits and policy reviews.

16. Accountability and Review

The Board holds responsibility for data protection compliance. The Project Manager manages operational compliance. Policies are reviewed annually or earlier if legislation or operational requirements change.

Confidentiality & Information Handling Policy

Project Prometheus C.I.C.

1. Introduction

Confidentiality is fundamental to the ethical delivery of Guardian Check. Participants and guardians must feel safe to disclose sensitive information relating to gambling behaviours, financial crises, family tensions and mental health context. Unlike traditional therapeutic services, Guardian Check operates within a lived-experience, financial-safeguarding and household-stabilisation framework, where information is shared not only between the organisation and the participant but also, with consent, between participants and guardians to protect household finances. This policy establishes the standards under which information is collected, stored, shared, and protected.

2. Purpose

The purpose of this policy is to ensure that all information obtained throughout programme delivery is handled lawfully, proportionately and respectfully, in accordance with confidentiality expectations, safeguarding responsibilities and data protection legislation. The policy also sets out how exceptions operate in situations involving crisis, safeguarding, dependants or substantial risk of harm.

3. Scope

This policy applies to all personal information processed by Project Prometheus, including participant, guardian, household, financial, safeguarding, operational and evaluation records. The policy applies to all directors, staff, volunteers, contractors, and delivery partners. It applies to both remote and in-person delivery and covers digital and physical records.

4. Nature of Information Processed

Guardian Check handles a complex mix of personal, special category, financial and relational information. Examples include gambling patterns, relapse events, access to funds, debts, bill payment continuity, credit use, mental health context, household composition and safeguarding disclosures. Some information is highly sensitive and may relate to family conflict, shame, secrecy or self-harm risk. The organisation recognises that mishandling such information may harm dignity, safety or trust.

5. Confidentiality Principles

Project Prometheus applies confidentiality through the following principles:

- information is used solely for operational, safeguarding or evaluation purposes;

- disclosure is minimised and proportionate;
- consent is sought wherever possible;
- lawful overrides are applied when required to prevent harm;
- access to information is restricted to those with legitimate operational need;
- dignity and respect remain central to communication and record keeping.

6. Household Financial Confidentiality

Guardian Check introduces a unique model of confidentiality related to household finances. Participants experiencing gambling addiction often require external financial oversight to prevent relapse-driven financial harm. Guardians (typically partners or family members) may receive financial information necessary to fulfil this function. However, guardians do not receive unrestricted access to all information, and disclosures must remain proportionate. Sensitive information unrelated to financial safeguarding (e.g. mental health disclosures or personal history) is not automatically shared with guardians without consent or lawful basis.

7. Multi-Agency Information Sharing

Guardian Check may collaborate with debt advice services, mental health services, NHS providers, social care, legal support, housing organisations or emergency services. Sharing information with external agencies is done based on necessity and lawful basis and may occur with or without explicit consent depending on the level of risk. Minimum necessary disclosure applies at all times. Where possible, evaluation and commissioning data is anonymised.

8. Exceptions to Confidentiality

Confidentiality may be overridden when there is:

- risk of serious financial harm to the household;
- safeguarding concerns involving dependants or vulnerable adults;
- mental health crisis involving suicide or self-harm risk;
- risk to life or immediate safety;
- legal obligation to disclose information;
- prevention or detection of crime, where applicable.

Overrides must be recorded, justified, proportionate and escalated to the appropriate authority or service.

9. Consent and Participant Rights

Participants provide consent for the collection and use of personal data at intake. Consent must be informed, specific and revocable. Withdrawal of consent does not result in punitive action but may limit the organisation's ability to deliver aspects of the programme. Participants may request clarification on how information is used and to whom it may be disclosed.

10. Record Keeping and Accuracy

Accurate records are essential for operational continuity, safeguarding and audit. Staff and volunteers must ensure that records are factually accurate, time-stamped and stored securely. Records must avoid stigmatising language and respect participant dignity. Financial and safeguarding notes must be sufficiently detailed to enable continuity across staff or during multi-agency coordination.

11. Storage and Security

Information is stored using secure systems and devices with restricted access. Physical documents are stored in locked cabinets. Digital files are password-protected and encrypted where appropriate. Staff and volunteers may not store participant or guardian information on personal devices unless authorised and controlled.

12. Disclosure Permissions and Boundaries

Participants may express boundaries regarding which information may be shared with guardians, family members or external services. The organisation respects these boundaries unless overridden by legal or safeguarding obligations. Discussions regarding boundaries are documented at intake and revisited periodically.

13. Evaluation and Commissioning

To demonstrate effectiveness and support commissioning, the organisation may provide anonymised data to councils, health boards, funders, researchers or oversight bodies. Case studies may be used with consent or anonymisation. Identifiable information is not shared with external evaluators without lawful basis and justification.

14. Training and Awareness

Staff, volunteers and Board members receive training on confidentiality, data protection, safeguarding, multi-agency communication and crisis escalation. Training is refreshed to reflect legislative or operational changes.

15. Complaints and Disputes

Participants and guardians may raise complaints concerning confidentiality breaches or inappropriate disclosure without fear of reprisal. Complaints are reviewed by the Board and may result in policy updates, training or corrective actions.

16. Review of the Policy

This policy is reviewed annually or sooner if legislative, commissioning or operational requirements change. The policy applies to all organisational activities and is approved by the Board.

