

**POLICY STATEMENT**

**CONFIDENTIALITY**

The Company ensures that the confidentiality of clients is maintained

**GLOSSARY OF TERMS**

**Client** – Any individual or company contracting with us for service including their employees.

**CROSS REFERENCES and other RESOURCE MATERIAL**

[Code of Conduct](#)  
[Data Protection Act 1998](#)  
[Information Commissioner](#) (responsible for Data Protection and FOI)

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## **Privacy and Confidentiality**

Nothing in this Policy shall be taken in substitution for any requirements under the Data Protection Act or amendments.

**Confidential information** – shall include but not be limited to any information which relates to medical information, the business, methods, costings, processes, techniques, financial forecasts and budgets, products, programming or research which is marked “confidential” or may be reasonably understood to be confidential or which is received in confidence from third parties by the company or its employees.

At the outset of any consideration of the question of confidentiality, it can not be too strongly emphasised that by far the most important standard by which to assess confidentiality is the individual’s personal integrity, honesty and standard of ethics.

Although the degree of confidentiality necessary to maintain an efficient exchange of information is a matter of judgement, essentially an attitude of mind, adherence to certain standards of conduct, will ensure that confidentiality and the appearance of confidentiality of information will be maintained. All employees and ex-employees must at all times maintain confidentiality of information classified as confidential obtained during the course of their employment at the company. Exceptional circumstances would be as follows:

- There is a professional duty to disclose information
- Disclosure is required by legal judicial process
- Disclosure is required by the law itself
- Disclosure is determined by the Directors to be necessary under the circumstances.

In the event of terminating employment, it is required that all such company property is returned, including but not limited to security keys, documents and stationary, credit cards, mobile telephones, motor vehicles, electronic equipment and any information relating to the affairs of the company or a client.

### **Procedure**

A breach of this policy may result in disciplinary action, including dismissal. In addition, such disciplinary measures will apply to any employee who directs or approves such actions, or has knowledge of them and does not move promptly to correct them in accordance with this policy.

Care should be taken to prevent unauthorised persons from obtaining access to premises. When outside persons are necessarily admitted to premises, then care and attention should be taken to ensure that the person does not see information considered confidential.

All employees are required to keep confidential files locked, to clear their desk and secure relevant workplace areas. Employees are not to discuss confidential company information except with those who have a need to know. In the event of clarification or a final judgement being required in respect of any matter in this policy, reference should be made, in the first instance to the Directors.

**General**

1. All client information and individual course participant information is kept in locked cabinets or out of sight.
2. The public has no access to client records.
3. Privacy and confidentiality is maintained by ensuring that client details are not recorded in public and are only done by our employees.
4. All billing information to those contracting with us is recorded by the Directors.
5. If an enquiry is made regarding billing, the person is always asked to identify themselves and no information is given unless full particulars are supplied.
6. If a person enquires about their personal marks they are asked to put the request in writing. This is then verified prior to information being supplied.
7. If a contractor makes enquiries about a particular incident only general information is supplied in line with relevant Legislation – having regards for the requirements of RIDDOR.
8. Employees are aware of the confidentiality requirements of their position and sign a employment contract form attesting to this fact.
9. All employee details are kept confidential subject to the relevant legislation and employees have access to their personnel files upon request.