



# DATA PROTECTION AND CONFIDENTIALITY POLICY

## 1. Current Policy

### 1.1 Policy Overview

- a. Business To Business's aim is to provide genuine protection of data to all staff, learners and prospective learners.
- b. Business to Business to maintain its registration with the Information Commissioner's Office
- c. We recognise that embracing confidentiality and data protection means that, in addition to compliance with current legislation, we can:
  - i. Stimulate a healthy and productive working environment
  - ii. Improve our corporate image with prospective employees and customers

### 1.2 Implementation of policies

- a. The success of this policy depends on the co-operation and commitment of all staff. This commitment starts at the highest level within the organisation with the Senior Partner being ultimately responsible for ensuring the implementation of this policy and the principles within. Data protection is essential to our business as it is very people orientated; consequently it is actively promoted in our business planning.
- b. The Policy is of restricted access for to all Business To Business's data.
- c. Business To Business will ensure that all members of staff are conscious of and work sensitively This will be done through the following provisions:
  - i. All staff will acquaint him/herself with Company Policy and procedures, and to respect and act in accordance with the provisions
  - ii. The Company will keep all names, addresses and records of learners and their achievements confidential, useless permission is granted to release such data.
  - iii. Any information on learners and their achievements will be kept on either paper based records or on removable IT discs in a secure location
  - iv. Any information requiring to be transferred to another centre will only be provided following the written request from the learner
  - v. If assessment is performed while other people are around, this will only be done with the learner's expressed permission.
  - vi. Any contracts and action plans negotiated between the centre's assessors and learners will be kept secure by the assessor.
  - vii. No details about the learners, their working practices or their employers will be passed on to any third parties unless their is prior written permission.
  - viii. Particular issues regarding confidentiality between the assessor or trainer and the learner, will be negotiated via their own contracts.

- ix. Candidates can view their own records held at the Company by appointment.
  - x. An exchange of information will be made to funding and award bodies in accordance with Business To Business' contractual arrangements
  - xi. Make any suggestions that may help to improve the implementation of the Company Policy on Data Protection
- d. As an employer, Business To Business seeks to:
- i. Effectively monitor and promote confidentiality and the protection of data. This will be monitored and reviewed, by internal processes. A quarterly review and monitoring of the protection of data will enable the Senior Partner to identify initiatives to address and develop appropriate plans
  - ii. Involve its managers in the implementation of this policy at operating level
  - iii. Recruit, train, and develop staff in all job areas, and to promote good practice and with particular reference to current legislation, including:
    - 1) Human Rights Act 1998
    - 2) Data Protection Act 1984 & 1998
  - iv. Provide an environment for its workforce to implement this policy
  - v. Ensure that all staff are aware of Business To Business's Grievance and Disciplinary procedures
- e. As a training provider, Business To Business seeks to:
- i. Ensure all learners are aware of our policies and procedures on Data Protection and Confidentiality.

### 1.3 Definitions

For the purpose of this Policy, we recognise the following definitions of key terms relating to Data Protection:

- a. Data will be seen as:
- Learner names and addresses
  - Employer names and addresses
  - Learner dates of birth
  - Learning & development details
  - And many others

### 1.4 Links with External Agencies

Business To Business works in co-operation with a wide range of External Agencies, including Examination Boards and other organisations as appropriate, to develop and maintain Codes of Practice which can assist in ensuring that assessment and course materials embody the principle of open and equal opportunity.

### 1.5 Future activity and policy development

Business To Business's policies and procedures as they relate to data protection and confidentiality will be monitored and kept under review by the Senior Partner at least annually, and will be amended as and when necessary to reflect relevant new legislation.