

Confidentiality Policy

The aim of this Confidentiality Policy is to ensure that all staff and users understand SimTrainer UK's requirements in relation to the disclosure of personal data and confidential information.

For the purpose of this policy, confidentiality relates to the transmission of personal, sensitive or identifiable information about individuals (confidential information), which comes into the possession of the Centre through its work.

SimTrainer UK is committed to maintaining high standards of confidentiality in all aspects of its work. This includes records and information pertaining to staff, prospective staff and learners, which will only be used for the purposes for which it was gathered and will not be disclosed to any other individual or centre without the user's expressed permission.

All personal data will be dealt with sensitively and in the strictest confidence, both internally and externally.

Legislative Framework

The Centre will monitor this policy to ensure it meets statutory and legal requirements of the Data Protection Act.

Information about staff

- In all but specific circumstances (e.g. disciplinary procedures), the decision as to who should be given of a piece of confidential information is the member of staff to whom it applies.
- Where such consent is sought it is necessary to tell the member of staff why there is a need to disclose information and to whom. The member of staff should be told of the likely consequences of their agreeing or not agreeing to this.
- Any consent given should be written, dated and signed specifying exactly what information may be disclosed.
- Once consent has been obtained, it is the responsibility of the person passing on any information to ensure that this is only done on the terms agreed.
- Unless previously authorised a request for a member of staff's address, phone number or email address will always be referred to the individual before any information is disclosed.

- In some cases there is an automatic right of access to certain parts of staff information e.g. HMRC. The staff member will be notified of any legal requirements whereby SimTrainer UK is obliged to provide such information.
- A staff member should never divulge another staff member's personal circumstances or information to anyone without permission of the other person.
- Do not write anything derogatory about a member of staff, or learners in a file or anywhere else.
- Make sure any discussion relating to information of another, takes place in an appropriate venue, e.g. not in a place where others, who are not entitled to know, can hear about it.

Record Keeping

- All personal paper-based and electronic data must be stored in accordance with the Data Protection Act 1998 and must be secured against unauthorised access, accidental disclosure, loss or destruction.
- All paper based records are kept in locked filing cabinets. This includes notebooks, copies of correspondence and any other sources of information.
- All computer records are password protected, and computers must be locked when left unattended.
- Access to personal files of staff will be given only in the circumstances outlined in the previous section. No staff member has the right to view any other parties' file except as specifically provided for in this policy. All information relating to staff and learners will be stored separately and only accessible through the Operations Manager. No personal data of learners is held by SimTrainer UK. Learner's assessment papers are only required by the External Verifier.
- Application forms, interview records, medical information and monitoring forms are confidential to SimTrainer UK. Equal opportunity monitoring forms will be detached from application forms on receipt and kept separate from application forms. When seeking references for a new staff member it is made clear to the referees that information is sought in confidence.
- For those unsuccessful in the hiring process, SimTrainer UK may wish to keep information about applicants; Only anonymous and the most relevant information will be kept, for equality monitoring purposes, (such as race, sex, etc) and the rest destroyed.

- Probationary reviews and appraisals of staff will only be available to the Managing Director and Operations Manager.
- Information will be kept for two years once a staff member has left SimTrainer UK. It will then be destroyed or archived.

Statistical Recording

SimTrainer UK is committed to effective statistical recording of the use of its services in order to monitor usage and performance.

All statistical records given to third parties, such as to support funding applications or monitoring reports for awarding bodies shall be produced in anonymous form, so individuals cannot be recognised.

Partnerships with other organisations

SimTrainer UK may be working in partnership with other organisations. All partnership agencies will be provided with a copy of the confidentiality procedure and the requirements SimTrainer places on the partnership organisations will be explained.

It will be agreed at the outset which staff in the partner organisation will have access to information and in what circumstances. Where specific information-sharing protocols exist that affect a particular organisation all concerned should be aware of this.

Any agreements with other organisations will state that breaches of confidentiality by either party will be treated as a breach of the agreement.

Ensuring the Effectiveness of the Policy

Existing and new staff will be introduced to and receive a copy of the confidentiality policy through induction and training. The implications of the procedure for their work will be explained.

The policy will be reviewed annually and amendments will be proposed and agreed by senior members of staff.

Breaches of Confidentiality

All staff are expected to abide by this policy. Breaches of this policy may give rise to disciplinary action in the case of staff. The nature of any breaches of this procedure will determine the level of action.