

# Inspiring Business Performance (IBP) Ltd. Confidentiality and Non Disclosure Policy

## **Introduction**

This Confidentiality and Non-disclosure Policy sets out the expectations and obligations on IBP consultants and associate employees (hereafter referred to as consultants). It is expected that the consultant will adhere to the policy, and understand his or her role in keeping confidential, proprietary and sensitive information.

## **Why confidentiality is important to IBP**

Through IBP's work, our consultants are often given privileged access to confidential or sensitive information. This information may be about the ways the client organisation works, future plans for products or services, or sensitive personnel or client data. In many cases it is only possible for IBP to work effectively with clients by internally exchanging this type of confidential or sensitive information. IBP takes significant steps to safeguard this information, including the following:

- all of our consultants are given training on managing confidentiality throughout a client engagement
- our consultants sign a confidentiality and non-disclosure agreement detailing the need for confidentiality and the serious consequences of any breach
- IBP has appointed a lead for policy issues covering confidentiality and non-disclosure (John Telfer)
- IBP has detailed data security processes for obtaining, storing and disposing of confidential or sensitive data.

## **General Security of data**

We understand it is critical for IBP to take steps to maintain the security of data received from our clients in confidence. All our consultants operate a range of IT and operational security procedures:

- secure login identification for using IT systems — each time our employees and consultants access IBP data, they are required to sign in using personalised password identification
- logical access controls — we limit access to information so that only consultants needing data to be able to deliver their client work, are given access to sensitive information
- protecting IBP IT systems — IBP's IT systems operate behind a firewall, and use encrypted storage of data. We work with an established IT service provider, which offers us the latest security functionality

- ensuring continuous operations — we have a detailed business continuity policy in place which encompasses: secure, encrypted, data backup; offsite storage; original record handling; secure disposal
- we limit the amount of paper-based confidential or sensitive data our consultants hold: any necessary confidential or sensitive paper records are kept in secure storage.

### **Client Survey Data**

- IBP's online surveys run on a secure, fully encrypted database which is based in the UK.
- Only a small number of nominated administrators have access to the programming and data files.
- Interpretive reports which may entail further analysis are prepared by IBP and presented in such a way as to ensure confidentiality.
- IBP's survey reports are designed to protect the anonymity of participants, therefore where there are less than five responses in a specified group, these entries are not displayed on the client's written survey report. This ensures that small groups in individual locations are not identified. However, these responses will be aggregated into the total.
- For pre-populated surveys, individual survey links are used, so it is not possible for the client to identify individual responses.
- Text questions may be used. These are optional and responses are reported verbatim. An explanatory note is included in the introductory page to cover this point.
- The data file is only available to a small number of nominated IBP administrators. It is not made available to other IBP staff, business partners or clients under any circumstances.
- The system analyses the data and produces reports which are available to clients on-line.
- Results are not shared with third parties except with the permission of the client's nominated representative.
- IBP does not have personal details of employees and thus conforms to the requirements of Data Protection and Freedom of Information legislation.

### **We place the following duty on all our staff:**

#### Confidentiality

The consultant shall, during their engagement keep with inviolable secrecy and shall not reveal, disclose or publish to any person other than the Managing Director and the designated employees of IBP, any matters concerning the financial relationship between the Consultant and the Client and shall not use for their own purposes or for any purpose other than those of the Client any information of a confidential nature which they may acquire or may have acquired in relation to the business or affairs of the Client

## Non-disclosure

Each IBP consultant signs our non-disclosure policy, which states:

*I agree that I will hold confidentially any and all knowledge or information that I may obtain in the course of my employment with IBP or from working with IBP's clients and with respect to the secret processes, plans, sensitive or personal information etc. used by IBP or IBP's clients in delivering its services.*

*I will keep confidential information so long as that information remains confidential and is not otherwise available in the public domain.*

*I will not engage as employer, employee, principal, agent, or otherwise, directly, in any matching business within one calendar year of terminating my contract with IBP.*

*I will not impart the knowledge specifically acquired through this employment with IBP to anybody and if I at any time end my contract with IBP I agree not to enter into the employ or service or otherwise act in aid of the business of any rival company or concern or individual engaged in matching lines of business for a period of 3 months.*

## **Contact**

The nominated person in IBP with responsibility for maintaining confidentiality is John Telfer. He can be contacted on [johntelfer@inspiring.uk.com](mailto:johntelfer@inspiring.uk.com) or 020 7492 5975.