



## Confidentiality Policy

### 1. Policy Statement

The company's business is to deliver training and development to our Candidates/Learners. Confidentiality is central and integral to protecting learners and offering safety and privacy. Information given is being held in strict confidence and in line with Data Protection Act(s). Immerse Medical Training LTD will safeguard the Learner's rights to confidentiality.

Our employees will not disclose any personal information about Learners to a third party unless:

- This has been agreed with the Learner concerned.
- The information required is subject to a court order.
- The information is required by the police as part of an investigation.
- The information will safeguard the learner.
- from harm either from themselves or others.

This policy will be used in conjunction with the Privacy Policy.

## Confidentiality Policy

### 2. Purpose

- To support the human rights of the Learner.
- To provide employees, and learners with
  - clear guidelines regarding handling of confidential information,
  - prescribed limits of behaviour
  - assigned responsibilities.

## Confidentiality Policy

### 3. Scope

All employees.



## Confidentiality Policy

### 4. Roles and Responsibilities

Immerse Medical Training LTD is responsible for ensuring that all employees involved in dealing with confidential information and data receive appropriate training, supervision and support regarding the policy and their legal responsibilities.

The Managing Director is responsible for ensuring that a copy of this document is available to all employees and is available to learners. It is the responsibility of the Office Manager to ensure all employees sign the Agreement and receive training as necessary.

The Managing Director is responsible for the annual review of this policy.

It is the responsibility of the directors to ensure that information is stored and handled in ways that limits access to those who have a need to know, directors should:

- Provide lockable filing cabinets to hold Learners' records and ensure those records are always kept secure.
- Arrange for information held on computers to be accessed only by appropriate personnel.
- Ensure that documents are not open to public view when sharing an office space
- Ensure that telephone conversations that could breach confidentiality are not held in the hearing of others when sharing an office space.
- Ensure that when the Learner's personal information needs to be disposed of it is shredded or disposed of appropriately.

#### Individual's Responsibility

Individual employees are required to act in accordance with the policy, failure to do so will be considered as an act of gross misconduct and will result in disciplinary action.



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### 5. Policy Implementation - Procedures

#### 5.1 All Employees should:

- Ask for identification in person. If being asked for information over the telephone, get the caller's details and ring them back before handing over Learner information.
- Only disclose information:
  - With the permission of the individual
  - In compliance with any statutory or legal obligations
  - For the legitimate interests of learners or a third party who has a legal right to such information
  - Where the courts have ordered such a disclosure
- Be aware of risks to confidentiality:
  - Can telephone conversations be overheard by others?
  - When discussing issues with Learners do you have privacy?
  - Do you mark "confidential" on anything, including outgoing mail and emails, which contain personal information?
  - Are filing cabinets that store confidential information kept locked? This includes learner, employee records and personnel files.
  - Are employee laptops securely locked away when in an employee home or car? Are they too easy to gain access to?
  - Are documents being taken home to work on being kept in a safe place? Employees should not leave confidential or sensitive documents in their cars where they can be easily read or stolen.
  - Are office computer / laptops logged in all of the time so that anyone could gain personal employee or Learner information?

### **5.2 Employees should not:**

- Discuss Learners with persons not employed by Immerse Medical Training LTD, including (list not exhaustive);
  - Friends or family of the learner, unless permission has been given by the learner
  - Your own family and friends
  - Other professionals that do not need that information to provide their role or to safeguard the learner.
- Send emails or documents with information pertaining to Learners to anyone not directly involved in their support or employed by Immerse Medical Training LTD.
- Ask administration for, nor share colleague's personal information including telephone numbers and addresses.
- Share any computer passwords or phone lock passwords.

### **5.3 Confidential Reporting:**

All employees are expected to report malpractice and wrongdoing and may be liable to disciplinary action if they knowingly and deliberately withhold information relating to malpractice or wrongdoing in any respect of the service provision. Malpractice or wrongdoing (for example plagiarism) may be about something which:

- Is unlawful, or
- Is not in accordance with established standards of practice,
- Amounts to improper conduct by an employee or learner.

As a first step employees should normally raise concerns with their Supervisor/Line Manager.

Concerns may be raised verbally but are better raised in writing. Employees should set out the background and history of the concern giving relevant names, dates and places where possible and the reason why you are particularly concerned about the situation and will be required to demonstrate to the supervisor/line manager that there are sufficient grounds for concern.

Some concerns may be resolved by agreed action without the need for investigation. Within 14 calendar days of an issue being raised under this procedure a nominated officer of the company will write to the employee who raised the concern:



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- Acknowledging the concern
- Indicating how it is being proposed to deal with the matter (please note if the concern results in disciplinary action of an employee this is confidential, and details of the disciplinary action will not be given to you) and
- Giving an estimate as to how long it will take to provide a final response

The amount of contact between management and the employee who raised the concern will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided, if necessary further information may be sought.

#### **5.4 Working from home**

It is each individual employee's responsibility to follow this policy when working from home and ensure that information is not easily accessible to others that are not employed by Immerse Medical Training LTD, this is true of both laptops, mobile phones (containing colleague/client information) and documents that are in an employee's home.



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## APPENDIX 1 – Confidentiality Agreement

I have read and understand the content of Immerse Medical Training LTD's Confidentiality Policy and Privacy Policy.

I agree to act in accordance with these Policies.

I am aware that information that:

- A. is or has been obtained during, or in the course involvement, or has otherwise been acquired in trust due to involvement with the Company
- B. relates particularly to the company's business, clients, learners or that of other persons or bodies with whom we have dealings of any sort, and
- C. has not been made public by, or with our authority,

is confidential, and (save in the course of our business or as required by law) an employee /volunteer /learner shall not at any time, whether before or after the end of their involvement, disclose such information in any form to any person without our written consent.

I agree to exercise care to keep safe all documentary or other material containing confidential information, and at the time of end of my involvement with Immerse Medical Training LTD or at any other time upon demand, return to the organisation any such material in my possession.

I agree not to disclose any information held by the organisation and not independently available to a third party without the individual's written consent and permission from Management.

I realise that a breach of confidentiality is considered an act of Gross Misconduct and is subject to disciplinary action, that may include instant dismissal.

<b>Print Name:</b>
<b>Signature:</b>
<b>Date:</b>



Signed:

Date: 09/07/2025

Review of this version due by: 09/07/2026

### Reviews

Date	Approved – no changes	Approved – with amendments
04/09/18	M. Hyland – Managing Director	N/A
05/08/19	N/A	M. Hyland – Managing Director
06/08/20	M. Hyland – Managing Director	N/A
01/09/2021	N/A	M. Hyland – Managing Director
11/11/2022	M. Hyland – Managing Director	N/A
10/06/2024	H. Lawson - IQA	N/A
09/07/2025	H. Lawson - IQA	N/A