



TRIPLE P UK LIMITED

CONFIDENTIALITY POLICY

Version No: 1

The purpose of the Triple P UK Confidentiality Policy is to clearly set out the obligations of Triple P UK Personnel with respect to maintaining the confidentiality of the information they come into contact with through their work with Triple P UK.

Document type	Confidentiality Policy
Date approved	February 2020
Date implemented	February 2020
Next review date	July 2021 or sooner should legislative change require.
Policy author	TPG Information Governance (IG) Team
Applies to	<p>This Policy is relevant to all Triple P UK Personnel, as they will all have access to and be entrusted with confidential information during the course of their work for Triple P UK.</p> <p>Please Note: This Policy also applies to all Triple P International (TPI) TPI Personnel who process personal data/information on Triple P UK's behalf, as a result of Triple P UK outsourcing various business functions and tasks to the TPG head office. In those circumstances, references in this document to Triple P UK should be taken to be references to TPI.</p>

The local version of this document is the only version that is maintained. Any printed copies should therefore be viewed as “uncontrolled”, as they may not contain the latest updates and amendments. For the avoidance of doubt please see TPUKs Information Governance Lead.

1. CONFIDENTIAL INFORMATION

Confidential information is any information that needs to be kept private. It means all and any information concerning the Triple P UK's (and the wider Triple P Group's) business and finances. This including without limitation:

1. Technical procedure;
2. Intellectual property rights;
3. Triple P UK's customer, client and supplier lists (including prospective clients), their contact details and information about their employees;
4. Triple P UK's dealings, transactions and affairs;
5. Triple P & PECE products and services,
6. Financial projections, targets and accounts;
7. Commercial activities;
8. The business' future plans; and
9. Any information that Triple P UK is legally (through legislation or contractual obligations) required to keep confidential, including the personal data that is controlled and/or processed by Triple P UK.

All of the above types of information are confidential. They may be commercially sensitive and may also be potentially damaging to Triple P UK (legally, financially, reputationally) if disclosed to a third party. For example, if Triple P UK's client list (contacts at agencies and practitioners) was inappropriately disclosed, this could lead to those people being contacted by spammers, damage to Triple P UK's reputation, and investigation of the data breach by the UK's Information Commissioner's Office and a potential enforcement notice and/or fine under data protection laws.

2. POLICY STATEMENT

Triple P UK Personnel are expected to:

1. Deal with confidential information appropriately, during and after their work with Triple P UK. For Triple P UK employees' confidentiality is a condition of employment and extends after their employment has ended. For independent contractors, such as Contract Trainers and Implementation Consultants, it is a condition of their contract for services to Triple P UK and the confidentiality obligations extend beyond termination of the service agreement.
2. Only access and use confidential information, including personal data, if it is necessary for them to perform the functions of their role at Triple P UK.
3. Not use or divulge or disclose any Confidential Information, for their own benefit or for the benefit of any other person, firm or corporation (other than Triple P UK and its related bodies corporate).
4. Only disclose Confidential Information, within Triple P UK, within the Triple P Group and to individuals or organisations outside of the Triple P Group, when the disclosure is part of their duties, is appropriate, Triple P UK has a lawful basis for making the disclosure. That is, where the disclosure is authorised and they are authorised to make the disclosure.

For example, an approved/authorised disclosure may be built into the ordinary performance of a person's role. Triple P UK's Training Coordinators are authorised, in performing their role, to disclose certain confidential information to the Triple P Trainers, in the ebundle. This includes some information about course attendees and may include sensitive information, such as information about an attendee's impairment or special need. Triple P UK has a lawful basis and purpose for disclosing this information to the Trainer, and including the information in the ebundle and providing it to the Trainer is part of the Training Coordinator role. As such it is an appropriate, authorised disclosure and they are authorised to make the disclosure.

5. Not make any copies (electronic or otherwise) or record (electronic or otherwise, including memos, tape recordings, films, photographs etc) of Confidential Information (matters which is confidential to Triple P UK), other than copies or records made for Triple P UK's benefit and in the performance of their role.
 - Any copies or records will be and will remain the property of Triple P UK (or its related bodies corotate as appropriate).
 - Triple P UK may require its Personnel to surrender any copies or records of Confidential Information, at any time.
 - All Triple P UK Personnel are required to surrender any copies or records of Confidential Information, at the end of their work for Triple P UK. For employees, this will be no later than the date of termination of their employment. For contractors, this will be no later than the date of termination of their agreement to provide contractor services to Triple P UK.
6. Not create or print any client or customer list (other than in the proper performance of their duties) and any such list must not be removed from the Company's premises at any time and for any reason, without approval from senior management.

3. BREACH OF CONFIDENTIALITY

A breach of confidentiality may expose the business, and the individual to contractual and other legal claims. It may also cause serious damage to the reputation of Triple P UK.

Any breach of the policy will likely to constitute a serious matter which will lead to disciplinary action. In serious incidents this may lead to termination of employment without notice, and for contractors may lead to a termination of the contractor agreement.

4. REPORTING A BREACH

If Triple P UK Personnel believe there may have been a data breach (where confidential information has been lost or accessed and/or disclosed without authorisation), they are required to follow the procedures set out in Triple P UK's Data Breach Response Plan.

5. STORAGE OF CONFIDENTIAL INFORMATION

Triple P UK Personnel are required to store confidential information (including all personal data) in appropriate, designated locations (hard copy and electronic). For information about where particular Triple P UK records should be stored, please consider Triple P UK's Records Management Policy.

6. AUTHORISED DISCLOSURE OF CONFIDENTIAL INFORMATION

For information about appropriate ways to share Confidential Information (including all personal data) with third parties, please consider Triple P UK's Policy regarding Sharing Information with Third Parties and the Guidance for Triple P UK Personnel on Confidentiality and Sharing Information.