

iQuda staff confidentiality code of conduct

1. Introduction

All staff working for iQuda Ltd have a duty to keep confidential all data, personal information & information about our clients. The recently introduced General Data Protection Regulations (2016) “the GDPR” have strengthened the laws we must comply with. If the company is involved in a data breach we could be liable to heavy fines because the Information Commissioners Office (the ICO) has been given greater ability to enforce stricter controls since the introduction of the GDPR.

Over and above the legal implications of a data breach, it is our intention to provide our clients with a higher confidential service & to ensure that iQuda can be relied on to uphold confidentiality. We therefore require a commitment to confidentiality from all our staff. Clients who believe their confidentiality has been breached may make a complaint to iQuda or to the ICO, or take legal action against us. Our ICO registration number is ZA156764.

It is the intention of this policy to provide clear guidance to all iQuda staff, whether permanent or temporary, on confidentiality policy.

2. Purpose

This policy has been produced to ensure all staff members at iQuda are aware of their legal duty to maintain confidentiality, to inform staff of the processes in place to protect personal information, and to provide guidance on disclosure obligations.

3. Scope

Personal information is data in any form (paper, electronic, tape, verbal, etc) from which a living individual could be identified, including name, age, address, and personal circumstances, as well as sensitive personal information like race, health, sexuality, etc.

This code applies to the handling of any and all personal information relating to:

- Our clients, their organisations (Stakeholders), data and their staff (Data Protection Act 2018).
- iQuda Staff and all iQuda related data and information.
- All information iQuda processes.

The code is compulsory for all staff including permanent or temporary.

Classification: PUBLIC. iQuda Staff Confidentiality Code of Conduct. Ref: Q200.
Version Number: 5. Approved by: Anthony Jones. Created by: Garth Macintosh.
Created by: Garth Macintosh. Date of implementation: 01.09.2015. Date of last edit: 20.05.2019. Date of next review: 20.05.2020.

4. Recognise your obligations

A duty of confidence arises out of the common law duty of confidence and employment contracts, it is part of your professional obligations. Breaches of confidence and inappropriate use of records or computer systems are serious matters which could result in disciplinary proceedings, dismissal and possibly legal prosecution. So, make sure you **do**:

- Ensure that personal information is not at risk of unauthorised access. This means you should:
 - Lock confidential papers away when you are not working with them
 - Ensure that your desk is clear of paperwork at the end of the day. iQuda operates a clear desk policy.
 - Close computer screens if it is possible for other people to see personal/customers information that you are working on and always when you leave your desk, even temporarily
- Never knowingly misuse any personal/customers information or allow others to do so;
- Never access records or information that you have no legitimate reason to look at. This includes records and information about our customers and any of their staff/stakeholders.

Please refer to the QECADP iQuda Employee Confidentiality Agreement with Data Protection document and QCNACA iQuda Customer Network Access and Confidentiality Agreement for full detail of your confidentiality obligations. Please also refer to the QGDPR iQuda GDPR Policy. All staff are required to sign their agreement to these documents.

5. Keep personal information private

Make sure you comply with the following staff guidelines which set out practical things you should do to keep personal information protected:

- iQuda IG Overarching Policy (Q203)
- Use of passwords (iQuda IT Password policy (Q204)
- Appropriate use of computer systems (iQuda Acceptable Use Of Assets (Q210)
- iQuda Information security policy (Q201)
- iQuda Data Protection Policy (Q211)
- iQuda GDPR Policy (QGDPR).

6. Requests for information

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People are legally entitled to request confirmation of whether iQuda processes information about them. We are legally obliged to comply with these requests, and to provide the information we process in a commonly used format (e.g. Word, PDF etc). Please refer to the QGDPR iQuda GDPR Policy for more information.

7. Enforcement

This policy will be enforced by the Executive Team and Data Protection Officer. Violations may result in disciplinary action, which may include suspension, restriction of access, or more severe penalties up to and including termination of employment. Where illegal activities or theft of company property (physical or intellectual) are suspected, the company may report such activities to the applicable authorities.

8. Policy Review

This policy will be reviewed at least annually. The policy will be reviewed before this timeframe if the relevant supervisory authority releases new legislation or guidance.

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