# INFORMATION GOVERNANCE

## Company Policy

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# 1. SUMMARY

1.1. Information is a vital asset, both in terms of the management of individual service users and the efficient management of services and resources. It plays a key part in delivering effective tuition management.

1.2. It is of paramount importance to ensure that information is efficiently managed, and that appropriate policies, procedures and management accountability and structures provide a robust governance framework for information management.

# 2. PRINCIPLES

2.1. Paritor (hereafter referred to as "us", "we", or "our") recognises the need for an appropriate balance between openness and confidentiality in the management and use of information i.e. Information Governance (IG).

2.2. The importance of safeguarding both personal information about service users and staff and commercially sensitive information is paramount; however, we emphasise the importance of sharing service user information with other data centres and software in a controlled manner consistent with the interests of the service user to perform the tasks the software is built to undertake. In all instances, the focus remains on the safeguarding and sharing of personal, sensitive and confidential information in line with legal and regulatory requirements.

2.3. We believe that accurate, timely and relevant information is essential to deliver the highest quality software. As such it is the responsibility of all staff and managers to ensure and promote the quality of information and to actively use information in decision making processes.

# 3. OUR APPROACH TO INFORMATION GOVERNANCE (IG):

3.1. We undertake to implement IG effectively and will ensure the following:

i.     Information will be protected against unauthorised access;
ii.    Confidentiality of information will be assured;
iii.   Integrity of information will be maintained;
iv.    Information will be supported by the highest quality data;
v.     Regulatory and legislative requirements will be met;
vi.    Business continuity plans will be produced, maintained and tested;
vii.   IG training will be available to all staff as necessary to their role;
viii.  All breaches of confidentiality and information security, actual or suspected, will be reported and investigated.

# 4. PROCEDURES.

4.1. This IG policy is underpinned by the following policies and procedures:

i.        Our Data Hosting Compliance report https://paritor.com/data-hosting-and-compliance;

ii.       Our Privacy Policy https://paritor.com/privacy-policy

iii.      Our Terms and Conditions https://paritor.com/terms-and-conditions

iv.     Data Protection Policy (Staff Handbook) that provides staff with clear guidance on the disclosure of personal information.

4.2. There are 4 key interlinked strands to the IG policy:

i.        Openness

ii.       Legal compliance

iii.      Information security

iv.     Quality assurance

# 5. OPENNESS

5.1. We will be open and transparent with service users and those who lawfully act on their behalf in relation to their care and treatment. We will adhere to our responsibilities as outlined in all applicable data protection and privacy legislation.*

5.2. Service users should have ready access to information relating to their own tuition, their options for additional tuition and their rights to be forgotten.

5.3. There are clear procedures and arrangements for handling queries from service users and the public.

# 6. LEGAL COMPLIANCE

6.1. All identifiable personal information relating to service users is confidential.

6.2. All identifiable personal information relating to staff is confidential except where national policy on accountability and openness requires otherwise.

6.3. We will establish and maintain policies to ensure compliance with the Human Rights Act 1998, the Common Law Duty of Confidentiality and as outlined in all applicable data protection and privacy legislation.*

6.4. We will establish and maintain policies for the controlled and appropriate sharing of service user and staff information with other agencies, taking account of relevant legislation

# 7. INFORMATION SECURITY

7.1. We will establish and maintain policies for the effective and secure management of its information assets and resources.

7.2. We will undertake regular assessments and audits of our information security.

7.3. We will promote effective confidentiality, security and information sharing practices to our staff through policies, procedures and training.

# 8. INFORMATION QUALITY ASSURANCE

8.1. We will establish and maintain policies and procedures for information quality assurance and the effective management of records.

8.2. We will undertake regular assessments of our information quality and records management arrangements.

8.3. Data will be stored and recorded as outlined in all applicable data protection and privacy legislation.*

# 9. RESPONSIBILITIES

9.1. The designated Information Governance Lead for the organisation is Simon Dutton. The key responsibilities of the lead are:

i. To define Paritor's policy in respect of IG and ensuring that sufficient resources are provided to support the requirements of the policy.
ii. Developing and implementing IG procedures and processes for the organisation;
iii. Raising awareness and providing advice and guidelines about IG to all staff;
iv. Ensuring that any training made available is taken up;
v. Coordinating the activities of any other staff given data protection, confidentiality, information quality, records management and Freedom of Information responsibilities;
vi. Monitoring information handling in the organisation to ensure compliance with law, guidance and the organisation's procedures;
vii. Ensuring service users are appropriately informed about the organisation's information handling activities;
viii. Overseeing changes to systems and processes;
ix. Incident reporting. Any/all breaches will be appropriately dealt with, investigated and reported.
x. Ensuring that sufficient resources are provided to support the effective implementation of IG in order to ensure compliance with the law and professional codes of conduct

9.2. Business Manager is responsible for the Information Assets Register – this is the list of all devices and computer equipment in the organisation including who is responsible for it

9.3. Infrastructure Manager is responsible for the ICT services including access rights to computer based systems.

9.4. All staff, whether permanent, temporary or contracted, and contractors are responsible for ensuring that they are aware of and comply with the requirements of this policy and the procedures and guidelines produced to support it.

# 10. POLICY APPROVAL

10.1. Paritor acknowledges that information is a valuable asset, therefore it is wholly in our interest to ensure that the information we hold, in whatever form, is appropriately governed, protecting the interest of all stakeholders.

10.2. This policy, and its supporting standards and work instruction, are fully endorsed by the Managing Director through the production of these documents and their digitally confirmed approval.

10.3. All staff, contractors and other relevant parties will, therefore, ensure that these are observed in order that we may contribute to the achievement of Paritor's objectives and the delivery of effective tuition management to the service users.

10.4. These procedures have been approved by the undersigned and will be reviewed on an annual basis.

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| Name | Simon Dutton |

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| Date approved | 03/12/21 |
| Review date | 03/12/22 |

*Footnote*

*this means all applicable national implementing legislation, data protection and privacy legislation including the UK GDPR, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003 as amended, and any amendments and replacement legislation, binding decisions and guidance.*