



Confidentiality Policy

Confidentiality means that details about other people should only be disclosed on a need to know basis.

Employees will unavoidably receive and handle personal and private information about clients, partners and our company. We want to make sure that this information is well-protected. This policy affects all employees, including board members, investors, contractors and volunteers, who may have access to confidential information.

Employees have various levels of authorised access to confidential information. All Internal MBKB documents and meetings, and discussions and comments made in meetings by MBKB team members or invited guests are covered by this confidentiality agreement.

What employees should do:

- Lock or secure confidential information at all times
- Shred confidential documents when they're no longer needed
- Make sure they only view confidential information on secure devices
- Only disclose information to other employees when it's necessary and authorised
- Keep confidential documents inside our company's premises unless it's absolutely necessary to move them
- Consult your Line Manager, or another senior team member, immediately if you consider there may be good reason to break this rule or if you became aware that someone else has breached this policy.

What employees shouldn't do:

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of our company unless it is authorised, for example, to make a safeguarding referral to an agency.
- Replicate confidential documents and files and store them on insecure devices
- Discuss personal information given to you by learners, employers or other associates of a placement or MBKB team members with anyone outside of MBKB, and within MBKB it should only be shared on a need to know basis.

When employees stop working for our company, they're obliged to return any confidential files and delete them from their personal devices.

Exceptions

Confidential information may occasionally have to be disclosed for legitimate reasons.

Examples are:

- If a regulatory body requests it as part of an investigation or audit
- If the information is required as part of a safeguarding referral and needs to be shared for safety reasons.



In such cases, employees involved should document their disclosure procedure and collect all needed authorisations.

Disciplinary Consequences

Employees who don't respect our confidentiality policy will face disciplinary and, possibly, legal action.

We'll investigate every breach of this policy. We'll terminate any employee who willfully or regularly breaches our confidentiality guidelines for personal profit. We may also have to punish any unintentional breach of this policy depending on its frequency and seriousness. We'll terminate employees who repeatedly disregard this policy, even when they do so unintentionally.

This policy is binding even after separation of employment.