

CONFIDENTIALITY & CLIENT CARE – (CORPORATE)

TAKEOFF DIRECT LIMITED T/A TAKEOFF AVIATION ACADEMY

CLIENT CONFIDENTIALITY

Purpose of The Policy

The overall purpose of this policy is to ensure confidentiality in respect of all information relating to clients, management and contractors.

This policy is designed to promote clarity and transparency in what can be a complicated and/or involved immigration issues. This document is designed as a policy of what is to be achieved or adhered to, and how this is to be achieved.

Takeoff Direct Ltd confidentiality policies and procedures are underpinned by legislation including Article 8 of the Human Rights Act. All client information will be kept confidential except where the company is compelled to disclose information because of a legal or regulatory obligation.

The scope of this policy applies to the following areas:

- the provision of training, consultancy and support services;
- the recruitment, employment, training, and work related activities of paid and / or voluntary staff, and the Company's Management;
- the development of the Company's image and public relations;
- The Company's contact and working relationships with other support agencies, organisations, businesses, and contractors; and
- Clients support forum and all initiatives in which clients participate.

The scope of this policy covers confidential information including:

- details of client support issues, applications information, document information, and personal contact details;
- Students personal and professional files
- Staff and volunteers' personal files, personal salary and expense details, supervision/appraisal/disciplinary records, job application forms and references, training records and other work related issues, home addresses and personal phone numbers; and
- Paperwork, faxes, emails and details from discussions with clients from the Company staff, management, and client meetings and other meetings that may occur.

Policy Statement:

The Company is committed to best practices and procedure and will act responsibly and with

integrity when handling personal information and data.

All clients, staff and / or volunteers will be informed of the Company's Confidentiality Policy at the earliest opportunity and the Company will strive to ensure it has been clearly understood.

The Company will only seek and keep information that is required for its client's specific purpose and that is adequate, relevant, up-to-date, accurate, not excessive for that purpose and that it will be accessible only to those staff who need it to carry out their work for the Company.

The Company will ensure to keep the affairs of all its clients and all information relating to them confidential, except where The Company is compelled to disclose information by reason of a legal or regulatory obligation.

Current and former clients, staff and/or volunteers have a right to access any file about them held by The Company upon request• and to correct any inaccuracy in it. Information can only be withheld from a client for the following reasons:

- There is information that relates to, or is from, a third party, who has not given their consent for access to such information,

or such information that is subject to legal privilege.

Client information will be accessible upon request together with any organisational information that is not specifically confidential will also be openly available.

The administration of confidential information must only be carried out by employees and/or volunteers who are familiar with the Company's confidentiality policy.

What Information Is Confidential:

All staff and/or volunteers' personal files, salary details, supervision and appraisal notes, application forms and references.

- All clients, both current and former, including details of student's registration and training records.
- Immigration student's applications, interview notes and supporting information.
- Home addresses and personal phone numbers of clients, staff and/or volunteers.
- Confidential client's Company information so marked which is part of a project.

Procedures

Gathering of Information:

The Company's staff members or sub – contractors are responsible for collection of relevant information on clients to assess their professional needs and eligibility.

The Company will only approach third parties (other agencies and/or former employees) to verify information that is relevant to:

- supporting a staff's job application;
- supporting an application to volunteer with The Company; and
- supporting an application to join the Company's Management.

All applications for further information are normally made with an individual consent. It should be noted that if consent is denied, the Company may not be able to progress with, for example, a job application and that application may then fail.

Some personal information is kept on computer for service monitoring purposes and is covered under the Data Protection Act. The Company's staff will hold such database for this purpose so as to limit the amount of information provided only to what is needed for administrative task. Client database records and applications are also strictly confidential and are to be secured and kept out of view.

Personal information relating to clients is similarly of a highly confidential nature and is to be secured and kept out of view. This includes information relating to individual's immigration issues.

Access to Information

Current or former clients, staff members and/or volunteers have the right to reasonable access to any file held about them by the Company. Requests for such access should be made in writing and will be dealt with within 2 working weeks from the date of application.

Information received from or about, third parties will be kept separately within the clients, staff members and/or volunteer's personal files. Some third parties may have specifically given the information with the proviso that it was not to be disclosed to the person it referred to, and this is to be respected.

Individuals with a right to access may request access to their files verbally. The file may be viewed once the third party's information has been removed. If the individual wishes to have access to the third party's information, the Company will make contact in writing with the relevant parties and seek their permission to disclose the information.

Disclosure of Information

At the beginning of a relationship with a client, the Company's staff will explain the company's policy on confidentiality. It will be made clear that there are exclusions from the general policy of not disclosing information without the client's permission.

Information will be shared between the agency's representatives purely on a 'need to know' basis, i.e. information that is required to fulfil specific immigration requirements. As such, there will be different levels of disclosure.

In order that the Company's staff are fully supported and supervised, confidential information disclosed to its staff is to be shared only with the staff dealing with the client. Generally, disclosure to other persons or agencies will only be made with the informed consent of the client to whom the information relates.

If the health, safety, security or welfare of the client or others is seriously compromised, the Company will ensure that all client information will be kept confidential except where the adviser is compelled to disclose information by reason of legal obligation.

Storage of Information

All application forms and supporting information, including former clients, where any advice or services have been provided, regardless of whether the project is seen to its conclusion will be maintained for a minimum of six years.

Computerised information on clients will be kept indefinitely as this enables the Company to monitor its services from year to year and to identify trends. Database forms will be destroyed at year end to which they relate.

The Company's staff records and management information will be kept indefinitely as a management resource. At the request of a client relevant project records can also be kept indefinitely.