	Hygienia Business Assurance LLP (HBAL)	PROCEDURE MANUAL	
<b>DOC.NO. HBAL-IS-P3.3-01</b>	ISSUE 01	REVISION 00	12 APR 2024

## PROCEDURE FOR MANAGEMENT OF CONFIDENTIALITY OF DATA AND INFORMATION

### 1. PURPOSE

To enforce strict regime of confidentiality of data and information during the operation of inspection system

### 2. SCOPE

This covers HBAL Inspection Services operated in accordance with the QCI – Requirements for Hygiene Rating Audit Agency (HRAAs/Ver2/Oct 2022).

### 3. RESPONSIBILITY

3.1 Chairman & Managing Director is responsible for defining the responsibilities and obligation of the HBAL-IS and the clients

3. Technical Manager (SME) will ensure implementation of this procedure


### 4. PROCEDURE:

**4.1** HBAL-IS is responsible to keep all information obtained or created during the performance of Hygiene Rating Auditing activities confidential.

**4.2** HBAL-IS has procedures and arrangements to safeguard the confidentiality of the information obtained or created during the performance of Hygiene Rating Auditing activities at all levels of its structure, including committees and external bodies, or individuals acting on its behalf.

**4.3** HBAL-IS ensures that all Hygiene Rating Auditors / personnel, subcontractors and committee members give signed “confidentiality statements” to maintain confidentiality in Hygiene Rating Auditing activities and data and information they are involved in.

**4.4** HBAL-IS informs the client, in advance, of the information it intends to place in the public domain except for information that the client makes publicly available, or when agreed between HBAL-IS and the client (e.g. for the purpose of responding to complaints), all other information is considered proprietary information and is regarded as confidential.

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**4.5** When HBAL-IS is required by law or authorized by contractual commitments to release confidential information, the client or individual concerned is, unless prohibited by law, notified of the information provided.

**4.6** Information about the client obtained from sources other than the client (e.g. complainant, regulators) is treated as confidential.

**4.7** When confidential information is made available to other bodies such as the accreditation body and agreement group of a peer assessment scheme, HBAL-IS shall inform its client of this action, in advance.

**4.8** HBAL-IS ensures that all those involved in the Hygiene Rating Auditing process (See4.3) maintain the strict confidentiality, and to protect the information which are related to the business of its clients and are available within HBAL Inspection Services.

## 5. REFERENCES

Reference	Document Name
HBAL-IS -FM 3.2-01	Impartiality and confidentiality statement from HBAL-IS personnel
HBAL-IS -FM 3.2-02	Impartiality & confidentiality statement from sub-contracted personnel