

Confidentiality and Security of Assessments Policy

Objectives

The aim of this policy is to protect confidential, technical, and financial information for the future performance of Summit Qualifications UK and the consequences of a breach of confidentiality. Assessments including knowledge, skills and practical assessments, or tests may, from time-to-time, require staff and others to follow security and confidentiality protocols to protect the integrity of the assessment.

Scope

This policy applies to all Summit Qualifications UK employees and contractors. Freelancers and contractors and any other third-party delivering services on behalf of Summit Qualifications UK should be made aware of this policy and understand their responsibilities under this policy.

For Summit Qualifications UK staff and contractors involved in the development and delivery of assessments maintaining the security and confidentiality of questions and marking schemes is crucial to ensuring the integrity of assessments.

Centre's when preparing to deliver assessments also need to be clear if information about the assessment, questions and mark schemes, or stimulus materials must be kept confidential.

In all cases the integrity of assessments and tests must be safeguarded to ensure the validity of the qualification outcome. This policy sets out the expectations and requirements of Summit Qualifications UK to be followed by centre staff, Summit Qualifications UK staff and its contractors to safeguard confidential assessment information.

Keeping confidential assessment information and materials secure

To maintain the security of confidential assessment information and materials including stimulus materials, questions and answer schemes will require security measures that are physical, or electronic.

Physical security measures that Summit Qualifications UK approves of include:

- Secure storage such as a locked cabinet, draw or safe (non-portable), to which only agreed staff have access.
- Access controls in place for the signing in and signing out of assessment materials.
- Sealed heavy duty envelopes are used to carry assessment papers when in transit.
- Should materials need to be posted, signed for next day delivery service must be used.
- Materials should not be worked on in open, or public spaces, or left lying on desks.
- Where materials require disposal, they should be shredded and securely disposed of.

Technological, or electronic security measures that Summit Qualifications UK approves of include:

- Assessment materials stored electronically are kept on systems that require strong password logins.
- Levels of access control within Summit EPA
- Files containing assessment materials should be saved in secure file folders that have access controls.
- Files containing confidential assessment information should not be emailed, if this is unavoidable documents must be encrypted with strong passwords.
- If assessment materials are kept on removal media e.g. DVD, CD these should be kept in secure storage.
- Confidential assessment materials should be kept in systems where files are backed up frequently.
- Where files are no longer being used, e.g. because the assessment development work has been concluded, any copies, or earlier versions of material on file should be archived.

The following arrangements are **not** approved of by Summit Qualifications UK when storing or working with confidential assessment information or materials:

- Use of memory sticks.
- Files saved on laptops or other mobile devices.
- Files saved on personal desktops, files must be located within appropriate file drives that have access controls.

Maintaining confidentiality of assessment information and breach

The need for confidentiality of what is contained within up-coming assessments is usually determined by the type of assessment. Summit Qualifications UK will clearly identify where information about assessments must be kept confidential.

The following safeguard must always be in place:



- Summit Qualifications UK staff and contractors, also centre staff who are involved in the development, review, preparation or handling of confidential assessment materials must have an up-to-date, signed Non-Disclosure Agreement.

Centres should also note that there may also be specific advice on security measures for assessment materials within Summit Qualifications UK assessment guidance.

Disclosure of confidential information is taken seriously by Summit Qualifications UK and usually leads to a malpractice investigation. Where wrong-doing is found, or breach of contract regarding confidential information, disciplinary action or appropriate sanctions will be applied to individuals or centres.

This includes any information about Summit Qualifications UK, including any information about our clients, Apprentices, and suppliers, confidential technical or financial information about Summit Qualifications UK.

Summit Qualifications UK employees and contractors must not remove any documents, or tangible items which belong to the Company, or which contain any Confidential Information from the Company's premises at any time without proper advance authorisation.

Summit Qualifications UK employees and contractors must return to the Company upon request and, in any event, upon the termination of employment or contract, all documents and tangible items which belong to the Company, or which contain or refer to any Confidential Information and which are in their possession or under their control.

All assessment materials, assessment plans, guidelines and other documentation developed by Summit Qualifications UK employees and contractors during the period of employment with the company, remain the property of the company. This material (both hard copies and those stored on the computer) must be returned to Summit Qualifications UK following the termination of employment or contract and cannot be used in future work whether in entirety or parts.

Summit Qualifications UK employees and contractors if requested by the Company, must delete all Confidential Information from any re-usable material and destroy all other documents and tangible items which contain or refer to any Confidential Information and which are in possession or under their control.

Any breaches of confidentiality will be deemed gross misconduct and action may be taken by the company to recover, without limitation, any damages caused as a result of the breach.

Prohibited training and circumstances where disclosure may be at greater risk

Individuals who are privy to confidential information about assessments and assessment materials should at all times be aware of the risk of disclosure.

The risk of disclosure may be greater in certain circumstances and the Summit Qualifications UK require that individuals should be particularly aware of the potential for disclosure in the following conditions:

- At training events where trainers or Apprentices are present, these may be face-to-face or video conference events.
- In interactions or meetings with interested parties who may gain an advantage from knowledge about assessment plans or content being shared.
- In publications, including learning resources about the subject matter/area. Publications may be paper or electronic formats.

Those who have knowledge about confidential assessments and associated materials and plans must not participate in prohibited training.

Definition of prohibited training:

Prohibited training is defined as any instruction or guidance provided where the content of confidential assessments or tests, and associated mark schemes may be provided in outline or in full, or in a way that might suggest that Apprentice preparation in a particular area or way may advantage that an Apprentice when taking a SummitQualifications UK assessment or test.

Summit Qualifications UK staff and contractors are advised to seek the agreement of their manager to participate in any training or writing of materials before embarking on any work.

For Summit Qualifications UK staff and contractor's any endorsement of training events and publications is not permitted where there is a potential that the event or materials may provide some advantage to assessors or Apprentices regarding confidential assessment information. Individuals

should seek advice on this matter from Summit Qualifications UK AO Manager if approached to endorse materials or events.

Reporting a breach of confidentiality or security

Where individuals become aware of any real or potential breaches to this policy, they should immediately notify Summit Qualifications UK's AO Manager.

Actions Summit Qualifications UK will take if confidential assessment information is disclosed

Where Summit Qualifications UK becomes aware of a real or potential breach of this policy and confidential assessment information is compromised, we will take measures to put in place alternative assessments.

If Summit Qualifications UK discover that after an assessment has taken place that confidential assessment information or materials were disclosed or shared, then Summit Qualifications UK will immediately set up a malpractice investigation. The outcomes of an investigation may conclude that the validity of the assessment was compromised and could lead to an Apprentice's results being cancelled, or some other action being taken.

In all instances of a real or potential breach, Summit Qualifications UK will undertake a malpractice investigation.

How Summit Qualifications UK monitor compliance with this confidentiality and security policy

Summit Qualifications UK's AO Manager will undertake a range of checks that may include the following monitoring activities, or be made aware of potential breaches in making sure confidential information about assessments is not shared:

- Review of agendas and training materials for planned meetings and training events.
- Review of any recordings of training sessions and events.
- Review of social media or websites that may report on such matters.
- External quality assurers reporting in any potential or real breaches of this Policy that they may become aware of from their dealings with centres.
- Review of training materials and other publications.
- Review of assessment data that may point to trends that suggest confidential assessment information may have been shared.