

Information Governance Policy

Introduction

Information is a vital asset for the management of services and company resources. It plays a key part in service planning and performance management. It is therefore of paramount importance that information is efficiently managed, and that appropriate policies, procedures, management accountability and structures provide a robust governance framework for information management.

Purpose of the policy

J&B Recycling Ltd is part of the Urbaser group of companies. This Information Governance (IG) policy provides an overview of J&B's approach to information governance, a guide to the procedures in use and details about the J&B IG management structures in place under the Urbaser Corporate Information Security Policy.

Approach to Information Governance

The company undertakes to implement information governance effectively and will ensure the following:

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

Procedures in use

This Information Governance policy is underpinned by the following procedures:

- Records and Document Control procedures within the Integrated Management System (IMS) that set out how records and information will be created, used, stored, transferred and disposed of.
- The management of access to computer-based information systems via the use of secure log on passwords file protection and cloud storage.
- Employee Handbook and IMS that sets out the procedures for managing and reporting incidents.
- Business continuity plan that sets out the procedures in the event of a security failure or disaster affecting computer systems.

Staff guidance in use

Staff compliance with the procedures is supported by the following guidance material

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- Records management procedure on good record keeping.
- The Staff Code of Conduct which sets out the required standards to maintain the confidentiality of information and obligations around the disclosure of information.
- Guidelines and training on the appropriate use of computer systems.
- Guidelines on maintaining confidentiality and security when working with portable or removable computer equipment;
- Guidelines on identifying and reporting information incidents.

Responsibilities and accountabilities

The designated Information Governance lead for the company is the Human Resources (HR) Manager

The key responsibilities of the lead are:

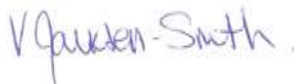
- Developing and implementing IG procedures and processes for the company
- Raising awareness and providing advice and guidelines about IG to all staff.
- Ensuring that any training made available is taken up.
- Coordinating the activities of any other staff given data protection, confidentiality, information quality, records management and Freedom of Information responsibilities.
- Ensuring that data is kept secure and that all data flows, internal and external are periodically checked.
- Monitoring information handling in the company to ensure compliance with law, guidance and company procedures.

The day to day responsibilities for providing guidance to staff will be undertaken by the HR Manager.

The Managing Director of the company is responsible for ensuring that sufficient resources are provided to support the effective implementation of IG in order to ensure compliance with the law, professional codes of conduct and any of the company's customer's information governance assurance frameworks.

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.

Signed:



Position: Managing Director

Date: 25th January 2022

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